

IN THE UNITED STATES BANKRUPTCY COURT  
NORTHERN DISTRICT OF GEORGIA  
ATLANTA DIVISION

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In re:	)	
	)	Chapter 11
	)	
LAVIE CARE CENTERS, LLC, <i>et al.</i> , <sup>1</sup>	)	Case No. 24-55507 (PMB)
	)	
Debtors.	)	(Jointly Administered)
	)	
	)	Obj. Deadline: Aug. 6, 2025 at 4:00 p.m. (ET)
	)	Hr'g Date: Aug. 29, 2025 at 10:00 a.m. (ET)
	)	(Only if objections are filed)

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NOTICE OF FILING OF FINAL APPLICATION OF  
MCDERMOTT WILL & EMERY LLP, COUNSEL TO THE DEBTORS AND  
DEBTORS-IN-POSSESSION, FOR ALLOWANCE AND PAYMENT OF  
COMPENSATION AND REIMBURSEMENT OF EXPENSES

**PLEASE TAKE NOTICE** that, on July 16, 2025, McDermott Will & Emery LLP (the “Applicant” or “McDermott”) filed its *Final Application of McDermott Will & Emery LLP, Counsel to the Debtors and Debtors-in-Possession, for Allowance and Payment of Compensation and Reimbursement of Expenses* (the “Application”). Pursuant to the Second Amended and Restated General Order No. 24-2018, the Court may consider this matter without further notice or a hearing if no party in interest files a response or objection **within twenty-one (21) days from the date of service of this notice. If you object to the relief requested in this pleading, you must timely file your objection with the Bankruptcy Clerk at Clerk, U.S. Bankruptcy Court, Suite 1340, 75 Ted Turner Drive, SW, Atlanta, Georgia 30303, and serve a copy on the Applicant: Daniel M. Simon (dsimon@mwe.com), McDermott Will & Emery LLP, 1180 Peachtree St. NE, Suite 3350, Atlanta, Georgia 30309** and any other appropriate persons by the objection deadline. The response or objection must explain your position and be actually received by the Bankruptcy Clerk within the required time.

A hearing on the Application has been scheduled for **August 29, 2025 at 10:00 a.m. (prevailing Eastern Time) in Courtroom 1202, United States Courthouse, 75 Ted Turner Drive, SW, Atlanta, Georgia 30303**, which may be attended in person or via the Court’s Virtual Hearing Room. You may join the Virtual Hearing Room through the “Dial-in and Virtual Bankruptcy Hearing Information” link at the top of the homepage of the Court’s website, [www.ganb.uscourts.gov](http://www.ganb.uscourts.gov), or the Virtual Hearing Room link on Judge Baisier’s webpage, which can be found at <https://www.ganb.uscourts.gov/content/honorable-paul-m-baisier>. Please also review

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<sup>1</sup> The last four digits of LaVie Care Centers, LLC’s federal tax identification number are 5592. There are 282 Debtors in these chapter 11 cases, which are being jointly administered for procedural purposes only. A complete list of the Debtors and the last four digits of their federal tax identification numbers are not provided herein. A complete list of such information may be obtained on the website of the Debtors’ claims and noticing agent at <https://www.veritaglobal.net/LaVie>. The location of LaVie Care Centers, LLC’s corporate headquarters and the Debtors’ service address is 1040 Crown Pointe Parkway, Suite 600, Atlanta, GA 30338.



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the “Hearing Information” tab on Judge Baisier’s webpage for further information about the hearing. You should be prepared to appear at the hearing via video, but you may leave your camera in the off position until the Court instructs otherwise. Unrepresented persons who do not have video capability may use the telephone dial-in information on the judge’s webpage.

If an objection or response is timely filed and served, the hearing will proceed as scheduled. **If you do not file a response or objection within the time permitted, the Court may grant the relief requested in the Application without further notice and without holding the scheduled hearing** provided that an order approving the relief requested is entered at least one business day prior to the scheduled hearing. If no objection is timely filed, but no order is entered granting the relief requested at least one business day prior to the scheduled hearing, the hearing will be held as scheduled.

**Your rights may be affected. You should read these papers carefully and discuss them with your attorney, if you have one in this bankruptcy case. If you do not have an attorney, you may wish to consult one.**

Dated: July 16, 2025  
Atlanta, Georgia

**MCDERMOTT WILL & EMERY LLP**

/s/ Daniel M. Simon

Daniel M. Simon (Georgia Bar No. 690075)  
1180 Peachtree St. NE, Suite 3350  
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- and -

Emily C. Keil (admitted *pro hac vice*)  
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**IN THE UNITED STATES BANKRUPTCY COURT  
NORTHERN DISTRICT OF GEORGIA  
ATLANTA DIVISION**

In re:	)	
	)	Chapter 11
	)	
LAVIE CARE CENTERS, LLC, <i>et al.</i> , <sup>1</sup>	)	Case No. 24-55507 (PMB)
	)	
Debtors.	)	(Jointly Administered)
	)	
	)	<b>Obj. Deadline: Aug. 6, 2025 at 4:00 p.m. (ET)</b>
	)	<b>Hr'g Date: Aug. 29, 2025 at 10:00 a.m. (ET)</b>
	)	<b>(Only if objections are filed)</b>

**SUMMARY OF FINAL APPLICATION OF MCDERMOTT WILL & EMERY LLP,  
COUNSEL TO THE DEBTORS AND DEBTORS-IN-POSSESSION, FOR ALLOWANCE  
AND PAYMENT OF COMPENSATION AND REIMBURSEMENT OF EXPENSES**

Name of Applicant:	<b>MCDERMOTT WILL &amp; EMERY LLP</b>
Authorized to provide professional services to:	<b>Debtors and Debtors-in-Possession</b>
Date of retention:	<b>July 19, 2024, effective as of June 2, 2024</b>
Period for which compensation and reimbursement is sought:	<b>June 2, 2024 through June 1, 2025</b>
Amount of final compensation sought as actual, reasonable, and necessary:	<b>\$8,804,907.50<sup>2</sup></b>
Amount of final expense reimbursement sought as actual, reasonable and necessary:	<b>\$193,798.27</b>

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<sup>1</sup> The last four digits of LaVie Care Centers, LLC's federal tax identification number are 5592. There are 282 Debtors in these chapter 11 cases, which are being jointly administered for procedural purposes only. A complete list of the Debtors and the last four digits of their federal tax identification numbers are not provided herein. A complete list of such information may be obtained on the website of the Debtors' claims and noticing agent at <https://www.veritaglobal.net/LaVie>. The location of LaVie Care Centers, LLC's corporate headquarters and the Debtors' service address is 1040 Crown Pointe Parkway, Suite 600, Atlanta, GA 30338.

<sup>2</sup> This amount includes \$8,789,907.50 of fees incurred in the Application Period (as defined herein) and estimated fees in the amount of \$15,000.00 incurred in connection with the preparation, filing, and prosecution of this Application (including attendance at the final fee application hearing, if necessary). To the extent such estimated amounts are in excess of actual amounts incurred in connection with these tasks, McDermott will reduce the amounts payable accordingly, and to the extent actual amounts incurred exceed this estimated amount, McDermott will waive any such excess amounts.

Amount of compensation paid to date as actual, reasonable, and necessary: **\$6,979,414.00**

Amount of expense reimbursement paid to date as actual, reasonable, and necessary: **\$141,622.64**

This is a: **Final Fee Application**

**Prior Monthly Fee Statements:**<sup>3</sup>

<b>Document</b>	<b>Date Served</b>	<b>Period Covered</b>	<b>Requested Fees/Expenses</b>	<b>Objections Served</b>	<b>Date Paid</b>
<b>First Monthly Fee Statement</b>	8/26/24	6/2/24 – 6/30/24	\$1,692,647.00 / \$38,882.94	None	9/10/24
<b>Second Monthly Fee Statement</b>	10/3/24	7/1/24 – 7/31/24	\$1,036,973.50 / \$13,899.83	None	10/18/24
<b>Third Monthly Fee Statement</b>	11/11/24	8/1/24 – 8/31/24	\$1,383,682.50 / \$23,579.78	None	11/26/24
<b>Fourth Monthly Fee Statement</b>	12/3/24	9/1/24 – 9/30/24	\$1,324,876.00 / \$21,775.63	None	12/18/24
<b>Fifth Monthly Fee Statement</b>	1/13/25	10/1/24 – 10/31/24	\$797,891.50 / \$18,551.53	None	1/30/25
<b>Sixth Monthly Fee Statement</b>	2/20/25	11/1/24 – 11/30/24	\$743,343.50 / \$24,932.93	None	3/10/25
<b>N/A</b>	N/A	12/1/24 – 12/31/24	\$381,033 / \$10,034.73	N/A	N/A
<b>N/A</b>	N/A	1/1/25 – 1/31/25	\$839,838.00 / \$21,050.67	N/A	N/A
<b>N/A</b>	N/A	2/1/25 – 2/28/25	\$95,801.00 / \$13,231.76	N/A	N/A
<b>N/A</b>	N/A	3/1/25 – 3/31/25	\$86,652.50 / \$156.23	N/A	N/A
<b>N/A</b>	N/A	4/1/25 – 4/30/25	\$278,199.00 / \$7,257.64	N/A	N/A
<b>N/A</b>	N/A	5/1/25 – 6/1/25	\$128,970.00 / \$444.60	N/A	N/A

<sup>3</sup> As discussed herein, the Complex Case Procedures provide that a retained professional may serve a monthly fee statement to certain professional fee notice parties at the end of each month for which compensation is sought, containing a list of individuals and their respective titles who provided services during the statement period, their respective billing rates, the aggregate hours spent by each individual, contemporaneously maintained time entries for each individual in increments of tenths of an hour, and a reasonably detailed breakdown of disbursements incurred. *See* Complex Case Procedures, at J(2)(a)-(b). Provided that there are no objections to the monthly fee statement served within ten days of service, a debtor is authorized to pay such retained professional hundred percent (100%) of the fees and expenses requested in such monthly fee statement. *See id.* at J(2)(d). In an effort to reduce administrative expenses, McDermott did not draft or serve monthly fee statements pursuant to the Complex Case Procedures for December 1, 2024 through June 1, 2025.



**LAVIE CARE CENTERS, LLC, ET AL.  
COUNSEL TO DEBTORS AND DEBTORS-IN-POSSESSION  
SUMMARY OF BILLING BY PROFESSIONAL FOR APPLICATION PERIOD  
FROM JUNE 2, 2024 THROUGH JUNE 1, 2025**

<b>Name of Professional Person</b>	<b>Date of Bar Admission</b>	<b>Position with the Applicant and Practice Area</b>	<b>Hourly Billing Rate<sup>1</sup></b>	<b>Total Billed Hours</b>	<b>Total Compensation</b>
Gary Karch	1980	Counsel; U.S. & International Tax	\$2,210	17.6	\$38,896.00
Michael Wilder	1995	Partner; U.S. & International Tax	\$1,975	1.5	\$2,962.50
Joel C. Haims	1994	Partner; Trial	\$1,830	317.7	\$581,391.00
Marcus Helt	2000	Partner; Corporate Advisory	\$1,750	2.2	\$3,850.00
Monica Wallace	2007	Partner; Healthcare	\$1,700	2.5	\$4,250.00
Sarah Kitchell	2011	Partner; Healthcare	\$1,680	0.4	\$672.00
Daniel M. Simon	2008	Partner; Corporate Advisory	\$1,650	1,119.9	\$1,847,835.00
Nathan M. Bull	2006	Partner; Trial	\$1,650	531.0	\$876,150.00
Ryan Smethurst	1999	Partner; Trial	\$1,650	2.6	\$4,290.00
Ryan Higgins	2007	Partner; Healthcare	\$1,600	0.4	\$640.00
Brian Tiemann	2008	Partner; Employee Benefits and Executive Compensation	\$1,575	91.7	\$144,427.50
Nick Alarif	2011	Partner; Healthcare	\$1,525	0.6	\$915.00
Asra Chatham	2011	Partner; Trial	\$1,525	11.9	\$18,147.50
Greg E. Fosheim	2014	Partner; Healthcare	\$1,525	0.6	\$915.00
Jay Greathouse	2012	Partner; Healthcare	\$1,525	18.2	\$27,755.00

<sup>1</sup> Except as set forth below and in the McDermott Retention Application [Docket No. 135], the rate represents the 2024 standard hourly rate of each McDermott attorney and paralegal who rendered legal services. Although McDermott increased its hourly rates effective as of January 1, 2025, McDermott agreed to not apply such increases to the Debtors' estates, resulting in significant cost savings.

<b>Name of Professional Person</b>	<b>Date of Bar Admission</b>	<b>Position with the Applicant and Practice Area</b>	<b>Hourly Billing Rate<sup>1</sup></b>	<b>Total Billed Hours</b>	<b>Total Compensation</b>
Mohsen Ghazi	2017	Partner; U.S. & International Tax	\$1,350	2.0	\$2,700.00
Jack G. Haake	2011	Associate; Corporate Advisory	\$1,335	429.6	\$573,516.00
Tim C. Cramton	2018	Partner; Trial	\$1,290	561.5	\$724,335.00
Alex Spisak	2014	Associate; Trial	\$1,245	26.2	\$32,619.00
Emily C. Keil	2018	Partner; Corporate Advisory	\$1,245	1,705.3	\$2,123,098.50
Jake Jumbeck	2017	Associate; Corporate Advisory	\$1,245	236.1	\$293,944.50
Natalie Rowles	2018	Associate; Corporate Advisory	\$1,245	7.1	\$8,839.50
John Hunt	2018	Associate; Corporate Advisory	\$1,245	36.5	\$45,442.50
Luke B. Barrett	2019	Associate; Corporate Advisory	\$1,245	29.6	\$36,852.00
Hilary Udow	2020	Associate; Trial	\$1,200	113.2	\$135,840.00
Benjamin Paulsen	2018	Associate; Private Client	\$1,200	24.4	\$29,280.00
Crystal N. Fomba	2021	Associate; Trial	\$1,200	100.0	\$120,000.00
Dexter Golinghorst	2021	Associate; Healthcare	\$1,155	5.0	\$5,775.00
Catherine T. Lee	2021	Associate; Corporate Advisory	\$1,155	256.0	\$295,680.00
Chenjia Zhu	2022	Associate; Trial	\$1,040	84.3	\$87,672.00
Landon Foody	2023	Associate; Corporate Advisory	\$1,040	128.1	\$133,224.00
Grayson I. Dimick	2021	Associate; Healthcare	\$1,040	2.7	\$2,808.00
Joshua C. Lee	2023	Associate; Corporate Advisory	\$1,020	17.9	\$18,258.00
Jacquelin Winters	2023	Associate; Trial	\$925	1.2	\$1,110.00

Name of Professional Person	Date of Bar Admission	Position with the Applicant and Practice Area	Hourly Billing Rate <sup>1</sup>	Total Billed Hours	Total Compensation
Rebecca E. Trickey	2022	Associate; Corporate Advisory	\$925	159.8	\$147,815.00
Sam Scaletta	2022	Associate; Corporate Advisory	\$925	19.8	\$18,315.00
Hayden Putre	2021	Associate; Trial	\$925	74.6	\$69,005.00
Christopher Shoemaker	2023	Associate; Trial	\$805	2.1	\$1,690.50
Corey A. Kraftsow	2024	Associate; Trial	\$805	4.0	\$3,220.00
Tim Mondloch	2024	Associate; Trial	\$805	3.5	\$2,817.50
David Ratnoff	2024	Associate; Trial	\$805	12.7	\$10,223.50
Carson Clear	2023	Associate; Corporate Advisory	\$805	3.3	\$2,656.50
Amanda Smith	2022	Associate; Trial	\$805	5.0	\$4,025.00
Milind Khurana	2023	Associate; Trial	\$805	60.4	\$48,622.00
Daniel Northrop	N/A	Paralegal; Corporate Advisory	\$745	128.3	\$95,583.50
Benjamin Casten	N/A	Discovery Consultant	\$690	7.7	\$5,313.00
Christine Gelat	2000	Discovery Counsel	\$590	33.3	\$19,647.00
Dean Butkovich	2007	Discovery Counsel	\$590	0.8	\$472.00
Edward Kwon	N/A	Manager of Technology Project Management	\$570	62.7	\$35,739.00
Alex Schiller	N/A	Technology Project Manager	\$570	24.6	\$14,022.00
Serena Wright	N/A	Technology Project Manager	\$570	1.6	\$912.00
Vincent Norwood	N/A	Staff Attorney	\$515	2.9	\$1,493.50
Nolley Rainey	N/A	Paralegal; Corporate Advisory	\$500	53.5	\$26,750.00
Aileen Requejado	N/A	Paralegal; Corporate Advisory	\$490	29.8	\$14,602.00

Name of Professional Person	Date of Bar Admission	Position with the Applicant and Practice Area	Hourly Billing Rate <sup>1</sup>	Total Billed Hours	Total Compensation
Kelsey Dietrich	N/A	Paralegal; Corporate Advisory	\$445	6.0	\$2,670.00
Ethan Song	N/A	Paralegal; IP Litigation	\$395	12.0	\$4,740.00
John Hoffman	N/A	Research Manager	\$385	1.9	\$731.50
A.J. Squillante	N/A	Paralegal; Trial	\$385	15.5	\$5,967.50
Albert Sieber	N/A	Senior Researcher	\$385	0.3	\$115.50
Scott Bride	N/A	Senior Researcher	\$385	3.0	\$1,155.00
Jacque Bishop Jones	N/A	Paralegal; Corporate Advisory	\$360	19.3	\$6,948.00
Jerry Drew	N/A	Litigation Technology Manager	\$300	2.2	\$660.00
Daniel Valentino	N/A	Litigation Technology Data Analyst	\$280	15.4	\$4,312.00
Andy Garcia	N/A	Litigation Technology Data Analyst	\$280	15.5	\$4,340.00
Fitalesh G. Belayneh	N/A	Litigation Technology Data Analyst	\$280	4.5	\$1,260.00
Robert Crooks	N/A	Project Attorney	\$55	33.8	\$1,859.00
John Goebel	N/A	Project Attorney	\$55	36.4	\$2,002.00
David Hope	N/A	Project Attorney	\$55	36.2	\$1,991.00
Gabriel Rutherford	N/A	Project Attorney	\$55	36.8	\$2,024.00
Theodore Terrell	N/A	Project Attorney	\$55	38.5	\$2,117.50
<b>TOTAL</b>				<b>6,853.2</b>	<b>\$8,789,907.50</b>

**LAVIE CARE CENTERS, LLC, ET AL.  
COUNSEL TO DEBTORS AND DEBTORS-IN-POSSESSION  
SUMMARY OF BILLING BY CATEGORY FOR APPLICATION PERIOD  
FROM JUNE 2, 2024 THROUGH JUNE 1, 2025**

<b>Project Category</b>	<b>Total Hours</b>	<b>Total Fees</b>
Case Administration	84.7	\$74,540.00
Asset Analysis and Recovery	2.1	\$1,795.00
Asset Disposition	209.3	\$283,141.50
Relief from Stay / Adequate Protection Proceedings	173.5	\$204,608.50
Meetings/Communications with Creditors	59.3	\$83,209.00
Court Hearings	307.1	\$429,515.00
Fee/Employment Applications	149.7	\$170,032.50
Fee/Employment Objections	2.8	\$2,912.00
Assumption/Rejection of Leases	62.7	\$74,913.50
Other Contested Matters	1,818.5	\$2,519,441.00
Non-Working Travel <sup>1</sup>	44.9	\$62,772.00
Business Operations	251.1	\$270,467.00
Employee Benefits/Pensions	17.8	\$18,870.00
Financing/Cash Collections	277.2	\$318,352.00
Tax Issues	27.8	\$53,151.00
Utilities	30.0	\$38,624.00
Vendor Matters	48.5	\$62,986.50
Insurance	67.9	\$83,164.00
Claims Administration & Objections	231.0	\$272,835.00
Plan and Disclosure Statement	1,003.8	\$1,348,611.50
Gen Bankruptcy Advice/Opinions	3.5	\$4,672.50
Internal Investigation	523.6	\$742,324.00
General Corporate	0.4	\$640.00
Litigation	1,456.0	\$1,668,330.00
<b>TOTAL</b>	<b>6,853.2</b>	<b>\$8,789,907.50</b>

<sup>1</sup> The hours billed to Non-Working Travel were reduced by fifty percent (50%), as reflected in the time detail attached hereto as Exhibit A-1 through Exhibit A-12.

**LAVIE CARE CENTERS, LLC, ET AL.  
COUNSEL TO DEBTORS AND DEBTORS-IN-POSSESSION  
EXPENSE SUMMARY FOR APPLICATION PERIOD FROM  
JUNE 2, 2024 THROUGH JUNE 1, 2025**

<b>Expense Category</b>	<b>Service Provider (if applicable)</b>	<b>Total Expenses</b>
Computer-Assisted Research	Various	\$77,763.41
Hearing and Deposition Transcripts	Various	\$12,912.27
Filing Fees	N/A	\$9,097.00
Certified Document Fees	CT Corporation	\$9,354.00
Travel Expenses	Various	\$21,859.59
Business Meals	Various	\$6,939.50
Messenger / Courier Services	Various	\$309.30
Discovery Hosting Charges	RelativityOne	\$55,563.20
<b>TOTAL</b>		<b>\$193,798.27</b>





expenses incurred for the period from June 2, 2024 through June 1, 2025 (the “Application Period”), and respectfully represents as follows:

### **JURISDICTION AND VENUE**

1. The United States Bankruptcy Court for the Northern District of Georgia (the “Court”) has jurisdiction to consider this Application pursuant to 28 U.S.C. §§ 157 and 1334. This is a core proceeding under 28 U.S.C. § 157(b). Venue of the Chapter 11 Cases and this Application in this District is proper under 28 U.S.C. §§ 1408 and 1409. The legal predicates for the relief requested herein are Bankruptcy Code sections 330 and 331, Bankruptcy Rule 2016, and Complex Case Procedure J.

### **BACKGROUND**

#### **I. The Chapter 11 Cases**

2. On June 2, 2024 (the “Petition Date”), each Debtor commenced a case by filing a petition for relief under chapter 11 of the Bankruptcy Code (collectively, the “Chapter 11 Cases”).

3. On June 13, 2024, the Office of the United States Trustee for Region 21 (the “U.S. Trustee”) appointed an official committee in the Chapter 11 Cases (the “Committee”). *See Appointment and Notice of Appointment of Committee of Creditors Holding Unsecured Claims* [Docket No. 112].

4. On June 25, 2024, the Debtors applied [Docket No. 135] (the “McDermott Retention Application”) to the Court for an order authorizing the Debtors to retain and employ McDermott as its counsel, effective as of June 2, 2024. On June 28, 2024, the Court entered an order [Docket No. 185] authorizing such retention, which became effective on July 19, 2024.

5. On December 5, 2024, the Court entered the *Findings of Fact, Conclusions of Law, and Order Approving on Final Basis and Confirming Debtors’ Modified Second Amended*

*Combined Disclosure Statement and Joint Chapter 11 Plan of Reorganization* [Docket No. 735] (the “Confirmation Order”), confirming the Plan. The Confirmation Order provides that final fee applications must be filed with the Court no later than 45 days after the Effective Date and served on the Reorganized Debtors, the GUC Trustee, and the U.S. Trustee. *See* Confirmation Order, ¶ 39. Objections, if any, to final fee applications must be filed and served on the Reorganized Debtors, the GUC Trustee, the requesting professional, and the U.S. Trustee no later than 21 days from the date on which the final fee application is served and filed. *See id.*

6. On June 2, 2025, the Debtors filed and served the *Notice of (I) Entry of Order Confirming Debtors’ Second Amended Combined Disclosure Statement and Joint Chapter 11 Plan of Reorganization and (II) Occurrence of the Effective Date* [Docket No. 1016], apprising parties-in-interest that the Plan became effective on June 1, 2025 (the “Effective Date”).

## **II. The Complex Case Procedures**

7. The Complex Case Procedures provide that a retained professional may serve a monthly fee statement (the “Monthly Statement”) at the end of each month for which compensation is sought on (a) counsel for the debtor; (b) counsel for the prepetition secured lender; (c) counsel for any post-petition lender; (d) counsel to all official committees; (e) the U.S. Trustee; and (f) any other party the Court designates (collectively, the “Professional Fee Notice Parties”). *See* Complex Case Procedure J(2)(a). Each Monthly Statement shall contain a list of individuals and their respective titles who provided services during the statement period, their respective billing rates, the aggregate hours spent by each individual, contemporaneously maintained time entries for each individual in increments of tenths of an hour, and a reasonably detailed breakdown of disbursements incurred. *See id.* at J(2)(b). In the event a Professional Fee Notice Party has an objection to the compensation or reimbursement sought in a particular Monthly Statement, it shall,

within ten (10) days after service of the Monthly Statement, serve upon the professional whose statement is objected to and the other Professional Fee Notice Parties a written “Notice of Objection to Fee Statement,” setting forth the nature of the objection and the amount of fees or expenses at issue. *See id.* at J(2)(c).

8. Provided that there are no objections to the monthly fee statement served within ten days after service of a monthly fee statement, the debtors are authorized to pay such retained professional hundred percent (100%) of the fees and one-hundred percent (100%) of the expenses requested in such monthly fee statement. *See id.* at J(2)(d). If counsel for the debtors receives an objection to such monthly fee statement, the debtors shall withhold payment of that portion of the monthly fee statement to which the objection is directed and shall, after the expiration of the ten day period, be authorized to promptly pay the remainder of the fees and expenses set forth in the monthly statement. *See id.* at J(2)(e). If an objection is filed to the monthly fee statement and the parties reach a consensual resolution, the objecting party (or the debtors, with the consent of the objecting party) shall serve written notice on the Professional Fee Notice Parties that the objection is withdrawn, shall describe the terms of the resolution, and the debtors shall be authorized to pay that portion of the monthly statement at issue that is no longer subject to an objection. *See id.* at J(2)(f). Any objection that is not resolved by the parties shall be preserved and presented to the Court at the next interim or final fee application hearing. *See id.* at J(2)(g).

### **III. McDermott’s Monthly Statements**

9. Pursuant to the Complex Case Procedures, McDermott served six Monthly Fee Statements, copies of which are attached hereto as **Exhibit A-1** through **Exhibit A-6**, on the Professional Fee Notice Parties for which no objections were received by McDermott and amounts were subsequently paid by the Debtors, as summarized below:

Document	Date Served	Period Covered	Requested Fees/Expenses	Objections Served	Date Paid
<b>First Monthly Fee Statement</b>	8/26/24	6/2/24 – 6/30/24	\$1,692,647.00 / \$38,882.94	None	9/10/24
<b>Second Monthly Fee Statement</b>	10/3/24	7/1/24 – 7/31/24	\$1,036,973.50 / \$13,899.83	None	10/18/24
<b>Third Monthly Fee Statement</b>	11/11/24	8/1/24 – 8/31/24	\$1,383,682.50 / \$23,579.78	None	11/26/24
<b>Fourth Monthly Fee Statement</b>	12/3/24	9/1/24 – 9/30/24	\$1,324,876.00 / \$21,775.63	None	12/18/24
<b>Fifth Monthly Fee Statement</b>	1/13/25	10/1/24 – 10/31/24	\$797,891.50 / \$18,551.53	None	1/30/25
<b>Sixth Monthly Fee Statement</b>	2/20/25	11/1/24 – 11/30/24	\$743,343.50 / \$24,932.93	None	3/10/25
N/A	N/A	12/1/24 – 12/31/24	\$381,033 / \$10,034.73	N/A	N/A
N/A	N/A	1/1/25 – 1/31/25	\$839,838.00 / \$21,050.67	N/A	N/A
N/A	N/A	2/1/25 – 2/28/25	\$95,801.00 / \$13,231.76	N/A	N/A
N/A	N/A	3/1/25 – 3/31/25	\$86,652.50 / \$156.23	N/A	N/A
N/A	N/A	4/1/25 – 4/30/25	\$278,199.00 / \$7,257.64	N/A	N/A
N/A	N/A	5/1/25 – 6/1/25	\$128,970.00 / \$444.60	N/A	N/A

10. To date, as reflected above, McDermott has received \$7,121,036.64 from the Debtors in connection with six Monthly Fee Statements for the period from June 2, 2024 through November 30, 2024, including \$6,979,414.00 in fees and \$141,622.64 in expenses.

11. As noted above, in an effort to reduce administrative expenses, McDermott did not draft or serve any other monthly fee statements during the Chapter 11 Cases. Copies of the invoices (the “Invoices”) reflecting the time detail, along with the fees and expenses incurred during the period of December 1, 2024 – June 1, 2025, are attached hereto as **Exhibit A-7** through **Exhibit A-12**.

**RELIEF REQUESTED**

12. By this Application, McDermott seeks final approval and allowance of compensation in the amount of \$8,804,907.50 for professional services rendered, and reimbursement of actual and necessary expenses incurred during the Application Period in the amount of \$193,798.27.

13. As set forth above, McDermott previously received \$7,121,036.64 in fees and expenses from the Debtors in connection with six consolidated monthly fee statements for the period from June 2, 2024 to November 30, 2024. Accordingly, McDermott seeks incremental payment of \$1,810,493.50 in fees and \$52,175.63 in expenses, plus estimated fees in the amount of \$15,000.00 incurred in connection with the preparation and filing of this Application. As disclosed in the McDermott Retention Application, McDermott currently has an existing prepetition retainer of \$568,556.81 and will apply such retainer toward the amounts sought in this Application. Therefore, as set forth below, subject to Court approval, McDermott requests final payment of \$1,309,112.32.

<b>Category</b>	<b>Amount</b>
<b><i>Fees</i></b>	
Fees Requested	\$8,789,907.50
<i>Minus</i> Fees Paid to Date	\$6,979,414.00
<i>Plus</i> Estimated Fee Application Fees	\$15,000.00
Fees Outstanding	\$1,825,493.50
<b><i>Expenses</i></b>	
Expenses Requested	\$193,798.27
<i>Minus</i> Expense Paid to Date	\$141,622.64
Expenses Outstanding	\$52,175.63
<b>Outstanding Fees to be Paid by Debtors</b>	<b>\$1,825,493.50</b>
<b>Outstanding Expenses to be Reimbursed by Debtors</b>	<b>\$52,175.63</b>
<i>Minus</i> Prepetition Retainer Amount	\$568,556.81
<b>Total Outstanding Amount to be Paid by Debtors</b>	<b>\$1,309,112.32</b>

**STATEMENT FROM MCDERMOTT**

14. McDermott has made reasonable efforts to comply with the *Appendix B Guidelines for Reviewing Applications for Compensation and Reimbursement of Expenses Filed Under 11 U.S.C. § 330 by Attorneys in Larger Chapter 11 Cases*, effective as of November 1, 2013 (the “U.S. Trustee Guidelines”). With respect to section C.5 of the U.S. Trustee Guidelines, McDermott respectfully states as follows with respect to the Application Period:

Question	Yes or No	Additional Explanation
Did you agree to any variations from, or alternatives to, your standard or customary billing rates, fees or terms for services pertaining this engagement that were provided during the application period? If so, please explain.	Yes	McDermott did not increase its billing rates as of January 1, 2025 and applied 2024 rates for the entire Application Period.
If the fees sought in this fee application as compared to the fees budgeted for the time period covered by this fee application are higher by 10% or more, did you discuss the reasons for the variation with the client?	N/A	The amounts sought under this Application are not more than 10% over the amounts allocated in the DIP Budget.
Have any of the professionals included in this fee application varied their hourly rate based on the geographic location of the bankruptcy case?	No	N/A
Does the fee application include time or fees related to reviewing or revising time records or preparing, reviewing, or revising invoices?	Yes	37.3 hours \$42,851.00 (less than 0.5% of fees sought)
Does the fee application include time or fees for reviewing time records to redact any privileged or other confidential information? If	Yes	

Question	Yes or No	Additional Explanation
so, please quantify by hours and fees.		
<p>If the fee application includes any rate increases since retention in these cases:</p> <p>i. Did your client review and approve those rate increases in advance?</p> <p>ii. Did your client agree when retaining the law firm to accept all future rate increases? If not, did you inform your client that they need not agree to modified rates or terms in order to have you continue the representation, consistent with ABA Formal Ethics Opinion 11-458?</p>	No	<p>McDermott did not increase its billing rates as of January 1, 2025 and applied 2024 rates for the entire Application Period.</p>

### **DESCRIPTION OF SERVICES PROVIDED**

15. During the Application Period, McDermott professionals, including attorneys, discovery professionals, and paraprofessionals (collectively, the “McDermott Professionals”), devoted 6,853.2 hours to, among other things, case administration matters, asset disposition matters, stay relief matters, meetings and communications with creditors, preparation for and attendance at court hearings, preparation of professional fee and retention applications, contract and lease assumption and rejection, analysis of and response to contested matters, business operations matters, employee matters, financing and cash collateral matters, tax matters, utility matters, vendor matters, insurance matters, claims administration and analysis, and plan and disclosure statement matters. In connection with the foregoing services, McDermott incurred fees during the Application Period in the amount of \$8,789,907.50. McDermott Professionals’ work in the majority of the foregoing matter categories is summarized below. Additionally, the Monthly



Fee Statements and Invoices attached hereto as **Exhibit A-1** through **Exhibit A-12** include detailed itemizations, by project category, of all services performed by McDermott with respect to the Chapter 11 Cases during the Application Period. This detailed itemization complies with Complex Case Procedure J in that each time entry contains (a) a separate time allotment, a description of the type of activity, and the subject matter of the activity; (b) all time is billed in increments of one-tenth of an hour; and (c) attorneys and paraprofessionals who rendered services related to each category are identified, along with the number of hours for each individual and the total compensation sought for each category.

**A. Case Administration**  
**Amount Sought: \$74,540.00**

16. During the Application Period, McDermott Professionals devoted time to case correspondence and monitoring case deadlines; filing case pleadings and coordinating service of such pleadings; and performing various other case management tasks. McDermott Professionals devoted a total of 84.7 hours to case administration matters during the Application Period, for which compensation in the amount of \$74,540.00 is sought.

**B. Asset Disposition**  
**Amount Sought: \$283,141.50**

17. During the Application Period, McDermott Professionals devoted time to numerous aspects of the Debtors' sale process including, but not limited to: (a) drafting, negotiating, and finalizing a proposed asset purchase agreement; (b) drafting and negotiating the governing bid procedures for the Debtors' sale process and preparing a motion with respect to the same; (c) communicating with Stout Capital LLC with respect to potential bidders and various due diligence requests; and (d) finalizing and filing schedule of potential cure costs with respect to potentially assumed contracts. McDermott Professionals also spent time drafting, negotiating, and

finalizing operations transfer documentation with respect to the Debtors' remaining facility in Florida (Harts Harbor), along with the related sale motion and accompanying notices necessary for Court approval. McDermott Professionals devoted a total of 209.3 hours to asset disposition matters during the Application Period, for which compensation in the amount of \$283,141.50 is sought.

**C. Relief from Stay / Adequate Protection Proceedings**  
**Amount Sought: \$204,608.50**

18. During the Application Period, McDermott Professionals devoted time to responding to numerous motions for relief from the automatic stay, including drafting an omnibus objection with respect to the same. McDermott Professionals devoted a total of 173.5 hours to stay relief matters during the Application Period, for which compensation in the amount of \$204,608.50 is sought.

**D. Meetings and Communications with Creditors**  
**Amount Sought: \$83,209.00**

19. During the Application Period, McDermott Professionals corresponded with and responded to inquiries from the Committee, current and former residents, employees, and other creditors regarding various aspects of the Chapter 11 Cases. McDermott Professionals also coordinated with the Debtors' claims and noticing agent, Kurtzman Carson Consultants d/b/a Vertia Global ("Verita"), to ensure that every incoming inquiry received a response. McDermott Professionals devoted a total of 59.3 hours to meetings and communications with creditors during the Application Period, for which compensation in the amount of \$83,209.00 is sought.

**E. Court Hearings**  
**Amount Sought: \$429,515.00**

20. During the Application Period, McDermott Professionals prepared for and attended numerous hearings, including a contested financing hearing and a contested confirmation hearing,

as well as several other hearings that, while eventually uncontested, required significant preparation. Among other things, McDermott Professionals (a) reviewed and analyzed pleadings and other materials in preparation for such hearings; (b) prepared witnesses for their potential testimony and cross examination; and (c) communicated with various parties-in-interest in preparation for such hearings. McDermott Professionals devoted a total of 307.1 hours to hearing-related matters during the Application Period, for which compensation in the amount of \$429,515.00 is sought.

**F. Fee/Employment Applications  
Amount Sought: \$170,032.50**

21. During the Application Period, McDermott Professionals prepared various employment, retention, and fee applications for the Debtors' professionals, including McDermott, Ankura Consulting Group, LLC, Stout Capital, LLC, and Verita. McDermott Professionals also sought approval of procedures for retention of "ordinary course professionals," and worked closely with such professionals to submit the necessary declarations in compliance with the Court's order approving their retention. McDermott Professionals devoted a total of 149.7 hours to fee and employment application matters during the Application Period, for which compensation in the amount of \$170,032.50 is sought.

**G. Assumption/Rejection of Leases  
Amount Sought: \$74,913.50**

22. During the Application Period, McDermott Professionals spent time examining issues related to the Debtors' executory contracts and unexpired leases and negotiating perspective cure amounts with various contract counterparties. McDermott Professionals devoted a total of 62.7 hours to lease matters during the Application Period, for which compensation in the amount of \$74,913.50 is sought.

**H. Other Contested Matters**  
**Amount Sought: \$2,519,441.00**

23. During the Application Period, McDermott Professionals spent significant time analyzing and addressing various contested matters in the Chapter 11 Cases. Among other things, McDermott Professionals (a) researched, drafted, and revised various pleadings to extend the automatic stay to non-Debtor entities and prosecuted the same against Healthcare Negligence Settlement Recovery Corp.; (b) commenced and/or responded to several other adversary proceedings, including filing a complaint against certain prepetition litigation parties regarding their release of prepetition claims; (c) drafted, prosecuted, and negotiated various documents regarding the litigation and subsequent settlement of employee retention tax credit issues with the Internal Revenue Service; (d) drafted, revised, and litigated numerous contested pleadings, including those related to issues raised by the Committee; and (e) negotiated a settlement with the Committee regarding potential estate claims and causes of action. McDermott Professionals devoted a total of 1,818.5 hours to other contested matters during the Application Period, for which compensation in the amount of \$2,519,441.00 is sought.

**I. Non-Working Travel**  
**Amount Sought: \$62,772.00**

24. During the Application Period, McDermott Professionals traveled to and from Atlanta, Georgia for various hearings and in-person mediation sessions. As reflected in the Monthly Fee Statements and time detail attached hereto as **Exhibit A**, amounts billed to this category were billed at 50%. McDermott Professionals devoted a total of 44.9 hours to non-working travel during the Application Period, for which compensation in the amount of \$62,772.00 is sought.

**J. Business Operations**  
**Amount Sought: \$270,467.00**

25. During the Application Period, McDermott Professionals provided services related to the day-to-day operations of the Debtors' business, prepared, reviewed, and filed monthly operating reports, schedules of assets and liabilities, and statements of financial affairs, and communicated with and responded to diligence requests by the U.S. Trustee, the Committee, and other parties-in-interest regarding various aspects of the Debtors' operations. McDermott Professionals devoted a total of 251.1 hours to business operations during the Application Period, for which compensation in the amount of \$270,467.00 is sought.

**K. Financing/Cash Collections**  
**Amount Sought: \$318,352.00**

26. During the Application Period, McDermott Professionals negotiated, drafted, and revised various pleadings, agreements, and amendments related to the Debtors' debtor-in-possession financing and use of cash collateral and addressed numerous contested issues with respect to the same with the Committee, the Debtors' prepetition ABL lender, and the United States. McDermott Professionals devoted a total of 277.2 hours to financing and cash collateral matters during the Application Period, for which compensation in the amount of \$318,352.00 is sought.

**L. Vendor Matters**  
**Amount Sought: \$62,986.50**

27. During the Application Period, McDermott Professionals engaged with vendors and suppliers to ensure continuity of services following the filing of these Chapter 11 Cases. McDermott Professionals devoted a total of 48.5 hours to vendor matters during the Application Period, for which compensation in the amount of \$62,986.50 is sought.

**M. Insurance Matters**  
**Amount Sought: \$83,164.00**

28. During the Application Period, McDermott Professionals reviewed and analyzed the Debtors' insurance policies, including the GLPL and workers' compensation policies, and negotiated with parties-in-interest with respect to the same. McDermott Professionals devoted a total of 67.9 hours to insurance matters during the Application Period, for which compensation in the amount of \$83,164.00 is sought.

**N. Claims Administration and Objections**  
**Amount Sought: \$272,835.00**

29. During the Application Period, McDermott Professionals prepared a bar date motion and related exhibits, including the applicable proof of claim form, spent time reviewing and analyzing certain proofs of claim, including various requests for payment of section 503(b)(9) claims, priority claims, and administrative expense claims, and prepared objections with respect to the same. McDermott Professionals devoted a total of 231.0 hours to claims administration and objection matters during the Application Period, for which compensation in the amount of \$272,835.00 is sought.

**O. Plan and Disclosure Statement**  
**Amount Sought: \$1,348,611.50**

30. During the Application Period, McDermott Professionals provided substantial services related to prosecution and confirmation of the Debtors' Plan and approval of the Debtors' disclosure statement. Among other things, McDermott Professionals:

- (a) researched and analyzed Plan issues, including third-party releases, debtor releases, and exculpation;
- (b) negotiated, drafted, revised, and filed multiple versions of the Plan and disclosure statement and related pleadings and documents, including solicitation materials;

- (c) negotiated, drafted, revised, and filed a confirmation order for the Plan, the accompanying memorandum of law and reply to objections to confirmation of the Plan, and other documents related thereto;
- (d) negotiated with the U.S. Trustee, the Committee, the Internal Revenue Service, the Department of Health & Human Services, and other parties-in-interest regarding their comments to the Plan and disclosure statement; and
- (e) obtained approval of the disclosure statement and confirmation of the Plan.

31. McDermott Professionals devoted a total of 1,003.8 hours to Plan and disclosure statement matters during the Application Period, for which compensation in the amount of \$1,348,611.50 is sought.

**P. Internal Investigation**  
**Amount Sought: \$742,324.00**

32. During the Application Period, McDermott Professionals provided substantial services related to the Debtors' investigation into potential claims and causes of action, including, among others, (a) preparing for and attending informational interviews with various parties, (b) preparing an analysis of the value and viability of the potential claims and causes of action, and (c) participating in negotiations with various parties-in-interest, including the Committee and the Debtors' independent manager, with respect to the same. McDermott Professionals devoted a total of 523.6 hours to internal investigation matters during the Application Period, for which compensation in the amount of \$742,324.00 is sought.

**Q. Litigation**  
**Amount Sought: \$1,668,330.00**

33. During the Application Period, McDermott Professionals provided substantial services related to various litigation workstreams, including, among others, (a) reviewing, negotiating, and responding to discovery requests; (b) preparing for and attending depositions; and (c) researching and drafting various pleadings in response to filings in the Chapter 11 Cases.



McDermott Professionals devoted a total of 1,456.0 hours to litigation matters during the Application Period, for which compensation in the amount of \$1,668,330.00 is sought.

**DESCRIPTION OF ACTUAL, REASONABLE, AND  
NECESSARY EXPENSES INCURRED**

34. McDermott incurred out-of-pocket expenses during the Application Period in the amount of \$193,798.27 for which McDermott seeks reimbursement. The summary sheets prefixed to this Application specify the categories of expenses and respective totals of expenses that McDermott incurred in connection with these Chapter 11 Cases. Detailed descriptions of the actual and necessary expenses incurred by McDermott in the performance of services rendered during the Application Period are reflected in the Monthly Fee Statements and Invoices attached hereto as **Exhibit A-1** through **Exhibit A-12**.

35. As illustrated in both the summary cover sheets and **Exhibit A-1** through **Exhibit A-12**, the expenses are broken down into various categories of charges, including travel expenses, business meals, transcripts, computer-assisted research, computer hosting and data storage fees for McDermott's licensed use of RelativityOne's document storage software, including processing, hosting, storage, and document conversion fees, and other various fees. Due to the particularly litigious nature of these Chapter 11 Cases, it was necessary and reasonable for the Debtors to obtain copies of transcripts of the multiple depositions and hearings to ensure adequate preparation for subsequent proceedings.

**BASIS FOR RELIEF & APPLICABLE AUTHORITY**

36. This Application is submitted under the standards set forth in *Grant v. George Schumann Tire & Battery Company*, 908 F.2d 874 (11th Cir. 1990); *Norman v. Housing Authority of the City of Montgomery*, 836 F.2d 1292 (11th Cir. 1988); and *Johnson v. Georgia Highway Express, Inc.*, 488 F.2d 714 (5th Cir. 1974). The twelve factors listed in *Johnson* and quoted in

*Grant*, affecting the fee application award included, *inter alia*, (a) the time and labor required; (b) the novelty and difficulty of the questions presented; (c) the skills requisite to performing the legal services properly; (d) the preclusion of other employment by the attorney or trustee due to acceptance of this case; (e) the customary fee charged by such attorney or trustee; (f) whether the fee is fixed or contingent; (g) time limitations imposed by the client or other circumstances; (h) the amount involved and the results obtained; (i) the experience, reputation and ability of the attorney or trustee; (j) the “undesirability” of the case; (k) the nature and length of the professional relationship with the client; and (l) awards in similar cases.

37. In accordance with the factors enumerated above, and given the facts and circumstances of the Chapter 11 Cases, McDermott submits that the amount requested is fair and reasonable in light of the awards in similar cases, and that McDermott involvement in these Chapter 11 Cases has deprived it of the ability to earn fees from other clients which would have been charged for service and the same or higher rate for which the Debtors’ estates are being charged at this time.

38. McDermott’s fees during the Application Period are also reasonable under the prevailing legal standard and should be allowed. The amount of these fees is not unusual given the complexity, size and the amount of work required to represent the Debtors’ interests in obtaining approval of a consensual plan in the Chapter 11 Cases. McDermott’s fees are commensurate with fees that other attorneys of comparable experience and expertise have charged and been awarded in similar chapter 11 cases. Accordingly, McDermott’s fees are reasonable pursuant to Bankruptcy Code section 330.

39. Bankruptcy Code section 330(a)(1)(B) permits reimbursement for actual and necessary expenses. *See* 11 U.S.C. § 330(a)(1)(B). McDermott’s expenses incurred on behalf of

the Debtors during the Application Period are set forth in this Application and constitute only those necessary expenses that were incurred for the benefit of the Debtors. McDermott has properly requested reimbursement of only actual, necessary and appropriate legal expenses.

40. Attached hereto as **Exhibit B** is the Declaration of Daniel M. Simon in support of the Application, confirming the facts set out in the Application and the exhibits attached hereto.

### **RESERVATION OF RIGHTS**

41. Although every effort has been made to include all fees and expenses incurred in the Application Period, some fees and expenses might not be included in this Application due to delays caused by accounting and processing during the Application Period. McDermott reserves the right to make further application to the Court for allowance of such fees and expenses not included herein.

### **NOTICE**

42. McDermott has provided notice of this Application to (a) the U.S. Trustee; (b) counsel to the GUC Trustee; (c) counsel to the Reorganized Debtors; and (d) counsel to the Professional Fee Notice Parties.

### **NO PRIOR REQUEST**

43. No prior request for the relief sought in the Application has been made to this or any other court.

*[Remainder of Page Intentionally Left Blank]*

**CONCLUSION**

WHEREFORE, McDermott respectfully requests (i) allowance on a final basis of (a) compensation in the amount of \$8,804,907.50 for professional services rendered to the Debtors during the Application Period; and (b) reimbursement of \$193,798.27 for actual and necessary expenses incurred during the Application Period; (ii) payment of \$1,309,112.32 for professional services rendered and actual and necessary expenses incurred; and (iii) such other or further relief as this Court deems proper.

Dated: July 16, 2025  
Atlanta, Georgia

**MCDERMOTT WILL & EMERY LLP**

/s/ Daniel M. Simon

Daniel M. Simon (Georgia Bar No. 690075)  
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- and -

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**CERTIFICATE OF SERVICE**

I hereby certify that on July 16, 2025, the foregoing *Final Fee Application of McDermott Will & Emery LLP, Counsel to the Debtors and Debtors-in-Possession, for Allowance and Payment of Compensation and Reimbursement of Expenses* was filed using the Bankruptcy Court's CM/ECF system, which automatically sends a notice of this document and an accompanying link to this document to all parties who have appeared in this case under the Bankruptcy Court's ECF program, and was also served on the Professional Notice Parties, counsel to the Reorganized Debtors, counsel to the GUC Trustee, and counsel to the U.S. Trustee.

Dated: July 16, 2025  
Atlanta, Georgia

**MCDERMOTT WILL & EMERY LLP**

/s/ Daniel M. Simon

Daniel M. Simon (Georgia Bar No. 690075)  
1180 Peachtree St. NE, Suite 3350  
Atlanta, Georgia 30309  
Telephone: (404) 260-8535  
Facsimile: (404) 393-5260  
Email: dsimon@mwe.com

**EXHIBIT A-1**

**First Monthly Fee Statement**  
***June 2, 2024 – June 30, 2024***

**IN THE UNITED STATES BANKRUPTCY COURT  
NORTHERN DISTRICT OF GEORGIA  
ATLANTA DIVISION**

In re:	)	
	)	Chapter 11
	)	
LAVIE CARE CENTERS, LLC, <i>et al.</i> ,	)	Case No. 24-55507 (PMB)
	)	
Debtors. <sup>1</sup>	)	(Jointly Administered)
	)	
	)	<b>Obj. Deadline: September 5, 2024</b>
	)	

**SUMMARY OF FIRST MONTHLY FEE STATEMENT OF  
MCDERMOTT WILL & EMERY LLP, COUNSEL TO THE DEBTORS AND  
DEBTORS-IN-POSSESSION, FOR ALLOWANCE OF COMPENSATION AND  
REIMBURSEMENT OF EXPENSES FOR THE PERIOD  
FROM JUNE 2, 2024 THROUGH JUNE 30, 2024**

Name of Applicant:	<b>McDERMOTT WILL &amp; EMERY LLP</b>
Authorized to provide professional services to:	<b>Debtors and Debtors-in-Possession</b>
Date of retention:	<b>July 19, 2024, effective as of June 2, 2024</b>
Period for which compensation and reimbursement is sought:	<b>June 2, 2024 through June 30, 2024</b>
Amount of compensation sought as actual, reasonable and necessary:	<b>\$1,692,647.00</b>
Amount of expense reimbursement sought as actual, reasonable and necessary:	<b>\$38,882.94</b>
This is a:	<b>First Monthly Fee Statement</b>

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<sup>1</sup> The last four digits of LaVie Care Centers, LLC's federal tax identification number are 5592. There are 282 Debtors in these chapter 11 cases, which are being jointly administered for procedural purposes only. A complete list of the Debtors and the last four digits of their federal tax identification numbers are not provided herein. A complete list of such information may be obtained on the website of the Debtors' claims and noticing agent at <https://www.veritaglobal.net/LaVie>. The location of LaVie Care Centers, LLC's corporate headquarters and the Debtors' service address is 1040 Crown Pointe Parkway, Suite 600, Atlanta, GA 30338.



**Prior Fee Statements:**

<b>Document</b>	<b>Date Filed</b>	<b>Period Covered</b>	<b>Requested Fees/Expenses</b>	<b>Approved Fees/Expenses</b>
N/A				

**LAVIE CARE CENTERS, LLC, ET AL.  
SUMMARY OF BILLING BY PROFESSIONAL  
JUNE 2, 2024 THROUGH JUNE 30, 2024**

<b>Name of Professional Person</b>	<b>Date of Bar Admission</b>	<b>Position with the Applicant and Practice Area</b>	<b>Hourly Billing Rate</b>	<b>Total Billed Hours</b>	<b>Total Compensation</b>
Joel C. Haims	1994	Partner; Trial	\$1,830	91.5	\$167,445.00
Marcus Helt	2000	Partner; Corporate Advisory	\$1,750	2.2	\$3,850.00
Monica Wallace	2007	Partner; Healthcare	\$1,700	2.5	\$4,250.00
Sarah Kitchell	2011	Partner; Healthcare	\$1,680	0.4	\$672.00
Daniel M. Simon	2008	Partner; Corporate Advisory	\$1,650	166.7	\$275,055.00
Nathan M. Bull	2006	Partner; Trial	\$1,650	62.4	\$102,960.00
Ryan Smethurst	1999	Partner; Trial	\$1,650	2.3	\$3,795.00
Nick Alarif	2011	Partner; Healthcare	\$1,525	0.6	\$915.00
Asra Chatham	2011	Partner; Trial	\$1,525	2.8	\$4,270.00
Greg E. Fosheim	2014	Partner; Healthcare	\$1,525	0.6	\$915.00
Jay Greathouse	2012	Partner; Healthcare	\$1,525	18.2	\$27,755.00
Jack G. Haake	2011	Associate; Corporate Advisory	\$1,335	149.5	\$199,582.50
Tim C. Cramton	2018	Associate; Trial	\$1,290	16.7	\$21,543.00
Emily C. Keil	2018	Associate; Corporate Advisory	\$1,245	220.6	\$274,647.00
Jake Jumbeck	2017	Associate; Corporate Advisory	\$1,245	118.1	\$147,034.50
John Hunt	2018	Associate; Corporate Advisory	\$1,245	36.5	\$45,442.50
Luke B. Barrett	2019	Associate; Corporate Advisory	\$1,245	7.1	\$8,839.50
Hilary Udow	2020	Associate; Trial	\$1,200	44.7	\$53,640.00
Benjamin Paulsen	2018	Associate; Private Client	\$1,200	7.3	\$8,760.00

<b>Name of Professional Person</b>	<b>Date of Bar Admission</b>	<b>Position with the Applicant and Practice Area</b>	<b>Hourly Billing Rate</b>	<b>Total Billed Hours</b>	<b>Total Compensation</b>
Crystal N. Fomba	2021	Associate; Trial	\$1,200	18.9	\$22,680.00
Dexter Golinghorst	2021	Associate; Healthcare	\$1,155	3.8	\$4,389.00
Catherine T. Lee	2021	Associate; Corporate Advisory	\$1,155	49.2	\$56,826.00
Chenjia Zhu	2022	Associate; Trial	\$1,040	19.3	\$20,072.00
Landon Foody	2023	Associate; Corporate Advisory	\$1,040	70.4	\$73,216.00
Grayson I. Dimick	2021	Associate; Healthcare	\$1,040	2.7	\$2,808.00
Rebecca E. Trickey	2022	Associate; Corporate Advisory	\$925	70.4	\$65,120.00
Sam Scaletta	2022	Associate; Corporate Advisory	\$925	19.8	\$18,315.00
Hayden Putre	2021	Associate; Trial	\$925	11.4	\$10,545.00
Amanda Smith	2022	Associate; Trial	\$805	5.0	\$4,025.00
Milind Khurana	2023	Associate; Trial	\$805	9.1	\$7,325.50
Daniel Northrop	N/A	Paralegal; Corporate Advisory	\$745	27.7	\$20,636.50
Benjamin Casten	N/A	Discovery Consultant	\$690	4.2	\$2,898.00
Dean Butkovich	2007	Discovery Counsel	\$590	0.8	\$472.00
Edward Kwon	N/A	Manager of Technology Project Management	\$570	5.8	\$3,306.00
Serena Wright	N/A	Technology Project Manager	\$570	1.6	\$912.00
Nolley Rainey	N/A	Paralegal; Corporate Advisory	\$500	4.7	\$2,350.00
Aileen Requejado	N/A	Paralegal; Corporate Advisory	\$490	29.8	\$14,602.00

Name of Professional Person	Date of Bar Admission	Position with the Applicant and Practice Area	Hourly Billing Rate	Total Billed Hours	Total Compensation
Kelsey Dietrich	N/A	Paralegal; Corporate Advisory	\$445	6.0	\$2,670.00
Ethan Song	N/A	Paralegal; IP Litigation	\$395	5.5	\$2,172.50
John Hoffman	N/A	Research Manager	\$385	1.9	\$731.50
A.J. Squillante	N/A	Paralegal; Trial	\$385	7.7	\$2,964.50
Albert Sieber	N/A	Senior Researcher	\$385	0.3	\$115.50
Jacque Bishop Jones	N/A	Paralegal; Corporate Advisory	\$360	1.0	\$360.00
Daniel Valentino	N/A	Litigation Technology Data Analyst	\$280	3.8	\$1,064.00
Fिताlesh G. Belayneh	N/A	Litigation Technology Data Analyst	\$280	2.5	\$700.00
<b>TOTALS</b>				<b>1,334.0</b>	<b>\$1,692,647.00</b>

**LAVIE CARE CENTERS, LLC, ET AL.  
COMPENSATION BY PROJECT CATEGORY  
JUNE 2, 2024 THROUGH JUNE 30, 2024**

<b>Project Category</b>	<b>Total Hours</b>	<b>Total Fees</b>
Case Administration	71.5	\$60,754.50
Asset Disposition	66.6	\$88,006.00
Relief from Stay / Adequate Protection Proceedings	8.1	\$10,278.00
Meetings/Communications with Creditors	22.1	\$33,123.00
Court Hearings	97.9	\$132,129.50
Fee/Employment Applications	78.8	\$89,802.50
Other Contested Matters	201.4	\$268,677.00
Non-Working Travel	12.1	\$15,856.50
Business Operations	73.2	\$96,953.00
Employee Benefits/Pensions	13.8	\$13,602.00
Financing/Cash Collections	222.3	\$253,555.00
Tax Issues	4.9	\$6,077.00
Utilities	15.3	\$20,176.50
Vendor Matters	16.1	\$20,366.00
Insurance	32.8	\$39,673.50
Claims Administration & Objections	9.2	\$11,560.00
Plan and Disclosure Statement	85.8	\$100,370.50
General Bankruptcy Advice/Opinions	3.5	\$4,672.50
Internal Investigation	194.2	\$277,627.00
Litigation	104.4	\$149,387.00
<b>TOTALS</b>	<b>1,334.0</b>	<b>\$1,692,647.00</b>

**LAVIE CARE CENTERS, LLC, ET AL.  
EXPENSE SUMMARY  
JUNE 2, 2024 THROUGH JUNE 30, 2024**

<b>Expense Category</b>	<b>Service Provider (if applicable)</b>	<b>Total Expenses</b>
Computer-Assisted Research	Various	\$7,646.55
Transcripts	N/A	\$20.00
Filing Fees	N/A	\$8,365.00
Certified Document Fees	CT Corporation	\$9,354.00
Travel Expenses	Various	\$5,810.36
Business Meals	Various	\$1,662.70
Messenger Services	Various	\$55.53
Discovery Hosting Charges	RelativityOne	\$5,968.80
<b>TOTAL</b>		<b>\$38,882.94</b>

**EXHIBIT A**

**Time Detail**



Invoice: 3919213  
Client: 120098

08/27/24

LaVie Care Centers, LLC  
1040 Crown Pointe Parkway  
Atlanta, GA 30338

For Services Rendered in Connection with:

Matter: 0013 Chapter 11

Task	Date	Name	Hours	Description
B110	06/02/24	N. Rainey	4.30	Electronically file fifty chapter 11 bankruptcy petitions (4.3).
B110	06/02/24	K. Dietrich	4.10	File Chapter 11 voluntary petitions in N.D. Georgia Bankruptcy Court (4.1).
B110	06/02/24	L. Foody	0.10	Participate in first-day motions conference with D. Simon, E. Keil, J. Haake, R. Ahmed, R. Shirole, et al. (.1).
B110	06/02/24	E. Song	5.50	Review voluntary petitions for non-individuals filing for bankruptcy and file same via ECF with Northern District of Georgia Bankruptcy Court (5.5).
B110	06/02/24	C. Lee	0.10	Conference with E. Keil, MWE team, Ankura team re first-day preparations (.1).
B110	06/02/24	E. Keil	5.80	Review and finalize petitions (2.8); conference with D. Northrop, N. Rainey, et al. re same (.4); correspondence with KCC re website, first-day notice plan (.3); review and finalize joint administration motion for filing (.6); correspondence with D. Northrop re filing of same (.1); correspondence with R. Trickey, L. Foody, et al. re revisions to first-day captions (.3); review and revise consolidated creditor matrix motion for filing (.5); review and finalize notice of commencement re same (.1); correspondence with D. Northrop re filing of consolidated creditor matrix motion (.1); review and finalize resident confidentiality motion for filing (.4); correspondence with L. Foody re same (.1); correspondence with D. Northrop re same (.1).
B110	06/02/24	A. Squillante	6.50	File fifty Chapter 11 bankruptcy petitions (6.5).
B110	06/02/24	D. Northrop	5.70	Prepare to file voluntary petitions, including review of instructions and order of filing from E. Keil (.4); review revised petitions to confirm correct NAICS code (.2); conference with petition filing team re





LaVie Care Centers, LLC

Client: 120098  
Invoice: 3919213  
Invoice Date: 08/27/24

Task	Date	Name	Hours	Description
				final preparations for filing and filing of first voluntary petition (.1); research for appropriate ECF filing events for various first-day motions and filings (.7); file voluntary petitions via ECF (3.2); file notice of designation of complex chapter 11 case and motion for joint administration on the ECF case docket in the lead case (.5); file schedules and statements extension motion and motion to file a consolidated creditor list and for related relief on the ECF case docket (.6).
B110	06/02/24	R. Trickey	3.70	Participate in conference with MWE and Ankura teams re filing issues (.1); finalize creditor matrix motion (.4); finalize joint administration motion (3.2).
B110	06/03/24	R. Trickey	2.10	Finalize joint administration motion with all case numbers (1.9); revise interim and final orders for consolidated creditors matrix motion (.2).
B110	06/03/24	E. Keil	4.80	Prepare list of case names and case numbers for US Trustee (1.2); review and finalize petitions for filing (1.7); review and finalize first-day declaration for filing (.2); correspondence with D. Northrop re same (.1); finalize request for expedited consideration for filing (.1); correspondence with D. Northrop re same (.1); revise notice of complex case (.1); correspondence with D. Northrop re filing of same (.1); correspondence with KCC team re notice, first-day service, website (.3); correspondence with Company re filing update (.2); correspondence with D. Northrop re joint admin, notice of complex case filing (.2); correspondence with L. Foody, R. Trickey, C. Lee, et al. re revised caption (.3); correspondence with clerk re pro hac fees (.2).
B110	06/03/24	A. Squillante	1.20	Continue filing fifty Chapter 11 bankruptcy petitions (1.2).
B110	06/03/24	K. Dietrich	1.90	File Chapter 11 voluntary petitions in N.D. Georgia Bankruptcy Court (1.9).
B110	06/03/24	N. Rainey	0.20	Communications with E. Keil re uploading joint administration order (.1); electronically upload same (.1).
B110	06/03/24	D. Northrop	1.90	File six additional voluntary petitions (.6); file Jones



LaVie Care Centers, LLC

Client: 120098  
Invoice: 3919213  
Invoice Date: 08/27/24

Task	Date	Name	Hours	Description
				declaration in support of chapter 11 petitions and first-day pleadings (.2); file request for expedited consideration of certain first-day matters (.2); batch file motion for joint administration and notice of designation of complex case across the 281 members cases (.5); revise pro hac vice motions and proposed orders for N. Bull, E. Keil, J. Haake, J. Jumbeck and C. Lee to add lead case number (.2); correspondence with E. Keil to arrange for delivery of pro hac vice applications and the check for payment of the pro hac vice fees to the Clerk of the Bankruptcy Court (.1); further correspondence with MWE team re check for payment of pro hac vice admission fee for five MWE attorneys (.1).
B110	06/04/24	R. Trickey	0.30	Revise creditor matrix order to conform to comments by the court and US Trustee (.3).
B110	06/04/24	D. Northrop	1.40	Update case critical dates memo (.5); review procedures for requesting transcripts of hearings in the Northern District of Georgia Bankruptcy Court, transcription rates and list of transcription service providers (.2); prepare transcript request for the June 4, 2024 first-day hearing (.3); finalize and submit transcript request (.1); communicate with MWE team re new case dates and deadlines (.3).
B110	06/04/24	E. Keil	0.70	Revise consolidated creditor matrix order (.3); correspondence with D. Northrop re uploading same (.1); revise resident confidentiality order (.2); correspondence with D. Northrop re uploading same (.1).
B110	06/04/24	J. Bishop Jones	1.00	Attend chapter 11 prep conference with MWE team (1.0).
B110	06/05/24	R. Trickey	1.90	Draft chart of deadlines re interim relief granted 6.5.24 for use by Debtors and Debtors' professionals (1.9).
B110	06/05/24	E. Keil	4.50	Correspondence, conferences with S. Reitzel, A. Dalsass, et al. re notice of commencement service, creditor matrix (.8); revise same (.3); revise resident letter re same (1.2); revise summary of interim order obligations (1.3); correspondence with R. Ahmed re same (.2); correspondence with KCC team re first-



LaVie Care Centers, LLC

Client: 120098  
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Invoice Date: 08/27/24

Task	Date	Name	Hours	Description
B110	06/05/24	D. Simon	1.50	day order service (.3); correspondence with A. Marchant-Lessa re filing of interim orders (.4). Conference with UST re open admin issues (.5); numerous conferences and emails re revisions to first-day pleadings and related administrative issues (1.0).
B110	06/05/24	D. Northrop	0.90	Review order entered 6.5.24 extending deadline for Debtors to file schedules and statements of financial affairs, and correspondence with MWE team re same (.1); update case critical dates memo (.4); communicate with MWE team re new case dates and deadlines (.4).
B110	06/05/24	D. Simon	1.00	Multiple conferences with Ankura re open case issues and strategy (1.0).
B110	06/06/24	E. Keil	1.10	Conference with J. Haake, J. Jumbeck, D. Simon re post-filing workstreams (1.1).
B110	06/06/24	D. Simon	0.30	Communications with UST office re administrative issues (.3).
B110	06/07/24	E. Keil	0.30	Correspondence with A. Dalsass re schedules and statements (.3).
B110	06/07/24	D. Northrop	0.10	Correspondence with E. Keil re new case dates, deadlines, and communications with MWE team re same (.1).
B110	06/07/24	J. Haake	0.40	Correspondence with A. Dalsass re service and administrative issues (.4).
B110	06/10/24	D. Northrop	1.20	Update case critical dates memo (.6); communications with MWE team re new case dates and deadlines (.6).
B110	06/11/24	D. Northrop	0.30	Update case critical dates memo (.2); communicate with MWE team re new case dates and deadlines (.1).
B110	06/12/24	E. Keil	0.60	Review and revise critical dates memorandum (.6).
B110	06/12/24	D. Northrop	0.70	Update case critical dates memo with dates/deadlines relating to the Debtors' proposed sale process and time line (.7).
B110	06/13/24	D. Northrop	0.10	Review US Trustee's notice appointing Committee of creditors' holding unsecured claims, and correspondence with MWE team re same (.1).
B110	06/13/24	D. Simon	1.30	Participate in check-in conference with client (.6); communications with client re Committee formation



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LaVie Care Centers, LLC

Client: 120098  
Invoice: 3919213  
Invoice Date: 08/27/24

Task	Date	Name	Hours	Description
				and next steps (.4); conference with UST re various administrative issues (.3).
B110	06/17/24	R. Trickey	0.60	Revise final order approving consolidated creditor matrix and consolidated MORs (.6).
B110	06/18/24	D. Northrop	0.10	Correspondence with N. Bull re Jones declaration in support chapter 11 petitions and first-day motions (.1).
B110	06/18/24	E. Keil	0.50	Revise org chart per UST request (.5).
B110	06/19/24	R. Trickey	0.30	Revise final orders for patient care vendors and consolidated creditor matrix motions (.3).
B110	06/19/24	E. Keil	1.00	Revise org chart at request of UST (1.0).
B110	06/19/24	T. Cramton	0.50	Review first-day declaration and related filings (.5).
B110	06/20/24	S. Wright	0.40	Participate in conference with MWE team re background information for litigation (.4).
B110	06/20/24	D. Northrop	0.10	Update case critical dates memo (.1).
B110	06/21/24	D. Northrop	0.10	Review notice of appearance filed by counsel for the Official Committee of Unsecured Creditors, and correspondence with MWE team re same (.1).
B110	06/28/24	D. Northrop	0.40	Communications with MWE team re new case dates and deadlines (.4).
B130	06/05/24	J. Haake	3.70	Draft revised bidding procedures motion (3.7).
B130	06/06/24	R. Trickey	6.50	Research issues re bidding procedures in 11th Circuit (3.5); revise bidding procedures motion (2.7); conference with J. Haake re same (.2); correspond with D. Simon, E. Keil, J. Haake re same (.1).
B130	06/06/24	J. Haake	2.40	Revise bid procedures and correspondence with R. Trickey re same (1.9); correspondence with D. Simon re bid procedures (.5).
B130	06/06/24	S. Kitchell	0.40	Identify and circulate draft of Operations Transfer Agreement (.3); note key regulatory considerations for same (.1).
B130	06/06/24	E. Keil	2.40	Revise bid procedures motion (1.6); draft notice re same (.3); conference with J. Haake re same (.3); correspondence with KCC re service of same (.2).
B130	06/06/24	D. Simon	1.20	Review and revise bidding procedures (1.2).
B130	06/07/24	D. Golvinghorst	0.30	Confer with J. Greathouse re draft SNF APA (.3).
B130	06/07/24	J. Haake	1.10	Conference with D. Simon re Sale Process Protocol and begin drafting same (1.1).
B130	06/07/24	E. Keil	0.20	Correspondence with J. Muenker, R. Lemons, et al.



LaVie Care Centers, LLC

Client: 120098  
Invoice: 3919213  
Invoice Date: 08/27/24

Task	Date	Name	Hours	Description
				re bid procedures (.2).
B130	06/07/24	D. Simon	1.40	Multiple conferences re bidding procedures (.8); revisions re same (.6).
B130	06/08/24	J. Haake	2.00	Revise bid procedures motion (1.6); conference and correspondence with D. Simon re same (.4).
B130	06/08/24	D. Simon	1.00	Revise bidding procedures (1.0).
B130	06/09/24	J. Haake	1.20	Revise bid procedures (.9); correspondence with D. Simon re same (.3).
B130	06/10/24	J. Haake	6.50	Prepare for and attend conference re bid procedures motion (.5); participate in conference re preparations for initial Debtor interview re same (.2); revise bid procedures (2.5); multiple conferences with D. Simon re bid procedures (.6); correspondence with E. Aguayo re service of bid procedures (.5); conference with L. Burton re bid procedures motion (.3); revise bid procedures to incorporate additional comments from L. Burton (.6); correspondence with A. Dalsass re bid procedures motion and service of same (.3); correspondence with J. Muenker re bid procedures motion and revise same (.6); correspondence with A. Masotta re bid procedures motion (.2); correspondence with D. Simon re filing of bid procedures motion (.2).
B130	06/10/24	D. Northrop	1.30	Review draft of Debtors' motion for entry of order approving bidding procedures and for related relief (.2); prepare to file Debtors' bidding procedures motion (.2); revise/finalize Debtors' bidding procedures motion and proposed order (with attachments) for filing (.5); correspondence with J. Haake re revisions to the motion and proposed order (.1); file Debtors' bidding procedures motion on the ECF case docket (.2); pay filing fee via pay.gov (.1).
B130	06/10/24	E. Keil	1.20	Conference with J. Muenker, R. Lemons, et al. re bid procedures (.4); conferences with J. Haake, D. Simon re same (.6); conference with KCC re noticing of same (.1); revise notice re same (.1).
B130	06/10/24	D. Simon	1.30	Review and revise bidding procedures (.8); conference with DIP lenders re same (.5).
B130	06/11/24	D. Golinghorst	0.50	Draft form SNF APA (.5).
B130	06/12/24	D. Golinghorst	2.80	Conference with J. Jumbeck re credit agreement and



LaVie Care Centers, LLC

Client: 120098  
Invoice: 3919213  
Invoice Date: 08/27/24

Task	Date	Name	Hours	Description
				seller structure (.3); draft APA for sale of Debtor assets (2.5).
B130	06/12/24	J. Haake	0.70	Analysis of sale issues and conference with D. Simon re strategy and sale process (.7).
B130	06/14/24	D. Golinghorst	0.20	Review and analyze correspondence re credit agreement draft (.2).
B130	06/14/24	J. Greathouse	1.90	Review and analyze form Operations Transfer Agreement and draft Asset Purchase Agreement (1.9).
B130	06/15/24	J. Greathouse	2.80	Review and revise draft Operations Transfer Agreement (2.8).
B130	06/16/24	J. Greathouse	4.80	Review and revise draft Operations Transfer Agreement (4.8).
B130	06/18/24	J. Haake	0.40	Correspondence with D. Simon re bid procedures and revise same (.4).
B130	06/21/24	J. Haake	1.50	Correspondence with D. Simon re bid procedures strategy (.3); correspondence with DIP lenders re bid procedures (.5); correspondence and conference with J. Wisler re bid procedures order (.7).
B130	06/21/24	J. Greathouse	1.90	Conference with lender counsel re healthcare reps (.8); review revisions to DIP Agreement (.7); correspond with team re comments to same (.4).
B130	06/22/24	D. Simon	0.50	Finalize transaction protocol (.3); conference with L. Aiken re bidding procedures (.2).
B130	06/23/24	J. Greathouse	2.80	Review and revise Operations Transfer Agreement (2.8).
B130	06/24/24	D. Simon	1.00	Conference with Committee re Stout launch (.7); prepare for same (.3).
B130	06/24/24	J. Haake	3.90	Conference with J. Wisler re bid procedures order (.5); conference with D. Simon re same (.3); conference with A. Dalsas re Cigna language in bid procedures (.3); revise orders and correspondence with E. Keil re same (.5); conference with D. Simon re strategy and sale process (.4); correspondence with L. Burton re bid procedures and revise same (.6); conference with Committee re sale process (.7); revise bid procedures order (.6).
B130	06/24/24	E. Keil	0.60	Conference with Stout team, F. Lawall, B. Jones, et al. re sale process launch (.6).
B130	06/24/24	D. Northrop	0.10	Review Committee limited objection and reservation





LaVie Care Centers, LLC

Client: 120098  
Invoice: 3919213  
Invoice Date: 08/27/24

Task	Date	Name	Hours	Description
				of rights with respect to Debtors' bidding procedures motion, and correspondence with MWE team re same (.1).
B130	06/25/24	R. Trickey	0.10	Correspond with L. Foody and Stout team re sale process matters (.1).
B130	06/25/24	M. Wallace	0.30	Review correspondence re OTA and breach implications (.3).
B130	06/25/24	L. Foody	0.50	Multiple correspondence with E. Keil and A. Masotta re NDA review (.2); review NDA in preparation of meeting (.3).
B130	06/26/24	M. Wallace	0.20	Review correspondence re OTA and breach considerations (.2).
B130	06/26/24	L. Foody	0.30	Participate in conference with Stout team re NDA process (.3).
B130	06/27/24	J. Haake	1.60	Revise orders and prepare auction notice (.4); correspondence with claims agent re service (.3); correspondence with R. Ahmed re administrative issues (.2); correspondence with D. Northrop re filing issues (.2); conference with J. Jumbeck and D. Simon re administrative issues (.5).
B130	06/27/24	L. Foody	1.60	Review NDAs received from Stout (1.6).
B130	06/27/24	D. Northrop	0.60	Review revised proposed bidding procedures order (.1); upload same via the order upload function in ECF (.1); review draft of auction notice (.1); revise auction notice, and correspondence with E. Keil and J. Haake re same (.1); file auction notice on the ECF case docket (.2).
B130	06/28/24	L. Foody	0.90	Conference with D. Simon and Stout team re NDAs (.2); continue review of NDAs (.7).
B140	06/05/24	E. Keil	0.90	Revise automatic stay extension pleadings (.8); correspondence with D. Simon, N. Bull re same (.1).
B140	06/06/24	C. Lee	2.90	Conference and correspond with D. Simon re state court automatic stay litigation (.2); research automatic stay issues re same (2.4); summarize findings re same (.3).
B140	06/06/24	D. Simon	1.70	Conference with J. Anthony re stay issues (.5); conferences with D. Dias and others re litigation issues re same (.7); conference with N. Bull re same (.5).
B140	06/07/24	C. Lee	1.80	Draft letter re stay violation (1.2); research



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LaVie Care Centers, LLC

Client: 120098  
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Task	Date	Name	Hours	Description
				precedent, case law re same (.3); correspond with E. Keil, MWE team re same (.3).
B140	06/18/24	C. Lee	0.60	Draft letter re violation of automatic stay (.4); correspond with E. Keil, MWE team re same (.2).
B140	06/19/24	C. Lee	0.20	Telephone conference with tort claimant counsel re violation of automatic stay (.2).
B150	06/05/24	D. Northrop	0.20	File notice of commencement of chapter 11 case and section 341 meeting of creditors on the ECF case docket (.2).
B150	06/05/24	E. Keil	0.40	Correspondence with the US Trustee re 341 meeting (.2); conference with J. Adams re same (.2).
B150	06/06/24	E. Keil	0.20	Correspondence with US Trustee re 341 notice (.2).
B150	06/06/24	D. Simon	0.30	Communications with UST office re 341 issues (.3).
B150	06/06/24	D. Northrop	0.10	Review (i) correspondence from the clerk's office re possible error in the docketing of the Debtors' Notice of Commencement of Chapter 11 cases and notice of section 341 meeting of creditors, and (ii) correspondence from D. Simon and E. Keil addressing same (.1).
B150	06/07/24	E. Keil	0.80	Correspondence and conference with A. Dalsass re resident letter (.5); correspondence with KCC re same (.3).
B150	06/14/24	D. Simon	0.60	Conference with Committee counsel (.3); follow up conference with client and others re same (.3).
B150	06/16/24	E. Keil	1.20	Conference with UCC counsel re case overview (1.2).
B150	06/16/24	D. Simon	1.40	Conference with creditors' Committee counsel, and follow up discussions re same (1.4).
B150	06/17/24	D. Simon	2.00	Participate in initial Debtor interview (2.0).
B150	06/18/24	D. Simon	2.30	Multiple conferences and correspondence re Committee diligence, data room, diligence requests (2.3).
B150	06/19/24	D. Simon	3.50	Multiple conferences and correspondence with Committee and MWE team re Committee data site and related issues (3.5).
B150	06/20/24	D. Simon	0.80	Multiple conferences and correspondence with Committee counsel (.8).
B150	06/22/24	N. Fomba	1.00	Review the initial document request for UCC counsel to the Debtors (1.0).
B150	06/23/24	E. Keil	1.00	Conference with F. Lawall, D. Kovak-Apap re UCC





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LaVie Care Centers, LLC

Client: 120098  
Invoice: 3919213  
Invoice Date: 08/27/24

Task	Date	Name	Hours	Description
				requests (1.0).
B150	06/28/24	J. Jumbeck	2.20	Participate in 341 meeting of creditors (2.2).
B150	06/28/24	D. Simon	3.80	Prepare for and attend 341 meeting with B. Jones (3.8).
B150	06/28/24	D. Northrop	0.30	Research procedure for obtaining audio files of 341 meetings conducted in the Northern District of Georgia from the Office of the US Trustee (.1); draft correspondence to the Office of the US Trustee for Region 21 (general mailbox) requesting the audio file of the 341 meeting held on 6.28.24 (.2).
B155	06/02/24	E. Keil	0.40	Correspondence with D. Simon, NDGA chambers re first-day hearing request (.2); correspondence with N. Rainey re revising hearing agenda (.2).
B155	06/03/24	N. Rainey	0.20	Revise draft of first-day hearing agenda (.2).
B155	06/03/24	J. Haake	3.70	Prepare for first-day hearing and conference with Ankura re same (3.7).
B155	06/03/24	E. Keil	4.50	Correspondence and conferences with D. Simon re hearing preparation (.4); conference with S. Morris re filing fees (.3); revise first-day agenda (.4); correspondence with D. Simon, D. Northrop re filing of same (.1); correspondence with KCC re service of same (.1); prepare for first-day hearing (3.2).
B155	06/03/24	D. Simon	10.40	Participate in multiple first day hearing strategy conference with Ankura team (3.5); numerous internal meetings and communications re same (2.8); review of first-day pleadings re same (1.6); draft outline and prep witness re same (2.5).
B155	06/04/24	R. Trickey	2.60	Participate in first-day hearing (2.6).
B155	06/04/24	J. Haake	5.20	Attend court hearing for first-day relief in person (5.2).
B155	06/04/24	J. Jumbeck	3.80	Prepare for and attend 6.4.24 first-day hearing (3.8).
B155	06/04/24	C. Lee	2.60	Telephonically participate in first-day hearing (2.6).
B155	06/04/24	L. Foody	2.60	Prepare for and participate in 6.4.24 first-day hearing (2.6).
B155	06/04/24	E. Keil	7.50	Prepare for and attend first-day hearing (7.1); conferences with clerk re revisions to interim orders (.4).
B155	06/04/24	D. Simon	7.20	Preparations for first-day hearing (3.5); meetings with client re same (1.2); participate in first-day hearing (2.5).



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Invoice: 3919213  
Invoice Date: 08/27/24

Task	Date	Name	Hours	Description
B155	06/05/24	D. Northrop	0.80	Follow-up correspondence with transcriber re preparation of transcript of first-day hearing and the transcriber's lack of availability to complete the transcript in the requested time frame (.2); contact other transcribers re their availability to complete the first-day hearing transcript in the requested time frame (.3); submit transcript order/request to available transcriber, including submitting deposit for the transcriber to commence work on the transcript (.3).
B155	06/07/24	E. Keil	0.30	Correspondence with A. Marchant-Lessa, S. Webb re omnibus hearings (.3).
B155	06/10/24	D. Northrop	0.30	Obtain transcript of first-day hearing from transcriber (.1); review same (.1); correspondence with MWE team re same (.1).
B155	06/10/24	E. Keil	0.20	Correspondence with S. Webb re omnibus hearings (.2).
B155	06/11/24	E. Keil	0.60	Correspondence with S. Webb re omnibus hearings (.1); draft notice re same (.3); correspondence with D. Northrop re filing of same (.1); correspondence with KCC re service of same (.1).
B155	06/12/24	E. Keil	0.20	Correspondence with S. Webb re omnibus hearings (.2).
B155	06/12/24	D. Northrop	0.30	File notice of omnibus hearings on the ECF case docket (.3).
B155	06/24/24	E. Keil	1.10	Draft agenda for second-day hearing (.8); draft witness and exhibit list (.3).
B155	06/25/24	R. Trickey	0.90	Draft electronic equipment motion (.8); correspond with E. Keil re same (.1).
B155	06/25/24	E. Keil	3.10	Draft direct outline re MOR issue (.8); revise second-day agenda (.6); draft witness and exhibit list (1.1); revise technology motion (.6).
B155	06/26/24	J. Jumbeck	6.80	Prepare and organize materials for second-day hearing (6.8).
B155	06/26/24	D. Northrop	2.30	File Debtors' agenda, witness and exhibit lists for the 6.28.24 hearing on the ECF case docket (.5); file motion for order authorizing use of electronic equipment (.4); upload proposed order authorizing use of electronic equipment (.1); review correspondence from the court requesting



LaVie Care Centers, LLC

Client: 120098  
Invoice: 3919213  
Invoice Date: 08/27/24

Task	Date	Name	Hours	Description
				submission of a revised proposed order authorizing use of electronic equipment (.1); obtain and review order authorizing use of electronic equipment by counsel for the Omega Parties in the courtroom entered at Docket No. 134 (.2); multiple correspondence with E. Keil re revisions to proposed order authorizing use of electronic equipment (.2); upload revised proposed order using the order upload function in ECF (.1); file amended agenda for the 6.28.24 hearing on the ECF case docket (.3); review order entered on 6.26.24 authorizing use of electronic equipment and correspondence with MWE team re same (.1); review UCC's multiple pro hac vice motion (.3).
B155	06/26/24	D. Simon	7.70	Prepare witness for hearing (4.5); prepare hearing outline (3.2).
B155	06/26/24	E. Keil	0.70	Revise electronics motion and order (.5); correspondence with A. Marchant-Lessa re same (.2).
B155	06/27/24	J. Haake	5.90	Prepare for and attend second-day hearing (5.9).
B155	06/27/24	J. Jumbeck	5.80	Prepare for and participate in second-day hearing (5.8).
B155	06/27/24	D. Simon	6.30	Prepare for contested hearing (2.3); participate in second-day hearing, including negotiations re final DIP order and related issues (4.0).
B155	06/27/24	E. Keil	3.90	Prepare for and participate in second-day hearing (3.4); review UCC exhibits re same (.5).
B160	06/02/24	R. Trickey	1.00	Draft Stout retention application (.9); correspond with L. Foody re same (.1).
B160	06/02/24	L. Foody	1.40	Review and revise KCC retention application (.5); prepare same for filing (.3); draft hearing outline re same (.6).
B160	06/02/24	E. Keil	0.40	Review and finalize KCC retention application for filing (.3); correspondence with D. Northrop re filing of same (.1).
B160	06/02/24	D. Northrop	0.30	File Debtors' first-day application to retain and employ Kurtzman Carson Consultants LLC as claims, noticing, solicitation and administrative agent on the ECF case docket (.3).
B160	06/03/24	R. Trickey	0.50	Correspond with E. Keil and L. Foody re retention



LaVie Care Centers, LLC

Client: 120098  
Invoice: 3919213  
Invoice Date: 08/27/24

Task	Date	Name	Hours	Description
				application/ordinary course professional retention (.2); conference with L. Foody re Stout retention application (.1); draft Stout retention application (.2).
B160	06/03/24	L. Foody	3.60	Revise KCC retention order (.2); conference with R. Trickey re investment banker retention (.1); continue drafting Ankura retention application (1.5); continue drafting MWE retention application (1.8).
B160	06/03/24	E. Keil	0.50	Correspondence with L. Foody, R. Trickey re OCP, retention applications (.3); correspondence with professionals re same (.2).
B160	06/04/24	R. Trickey	3.80	Review Stout engagement letter (.4); draft Stout retention application (3.4).
B160	06/04/24	L. Foody	1.50	Revise KCC retention order (.1); revise MWE retention application (.6); revise Ankura retention application (.8).
B160	06/04/24	E. Keil	0.30	Revise KCC order (.2); correspondence with D. Northrop re uploading same (.1).
B160	06/05/24	R. Trickey	5.10	Continue to draft Stout retention application (2.8); correspond with E. Keil re same (.1); draft ordinary course professionals retention motion (2.2).
B160	06/05/24	L. Foody	1.40	Review and revise Ankura retention application (1.4).
B160	06/05/24	E. Keil	0.90	Correspondence with L. Foody, A. Dalsass re Ankura retention application (.2); revise same (.5); correspondence with R. Ahmed, A. Dalsass re OCPs (.2).
B160	06/05/24	D. Northrop	0.10	Review order entered 6.5.24 granting Debtors' application to retain and employ KCC as claims, noticing, solicitation, administrative agent, and correspondence with MWE team re same (.1).
B160	06/06/24	R. Trickey	0.20	Revise Stout retention application re conflicts search results (.2).
B160	06/06/24	L. Foody	3.60	Continue reviewing and revising Ankura retention (1.2); continue reviewing and revising MWE retention application (2.4).
B160	06/06/24	E. Keil	0.80	Correspondence with Stout team re retention application (.2); revise same (.4); revise Ankura application (.2).
B160	06/07/24	R. Trickey	1.40	Revise Stout employment application (1.2);



**McDermott  
Will & Emery**

LaVie Care Centers, LLC

Client: 120098  
Invoice: 3919213  
Invoice Date: 08/27/24

Task	Date	Name	Hours	Description
B160	06/07/24	E. Keil	3.20	conference and correspond with E. Keil re same (.2). Revise Ankura retention application (1.4); revise Stout retention application (1.3); correspondence with R. Trickey, Stout team re same (.3); conference with R. Ahmed re OCP motion (.2).
B160	06/07/24	D. Simon	0.60	Review and analyze MWE retention application (.6).
B160	06/08/24	R. Trickey	0.10	Correspond with E. Keil re OCP motion (.1).
B160	06/08/24	E. Keil	1.80	Revise OCP motion (1.2); revise MWE retention application (.6).
B160	06/09/24	E. Keil	1.60	Revise MWE retention application (.6); revise Stout retention application (.4); revise Ankura retention application (.6).
B160	06/10/24	R. Trickey	2.60	Revise Stout retention application (2.2); correspond and conference with E. Keil and A. Masotta (Stout) re revisions to Stout retention application (.3); correspond with D. Simon re revisions to same (.1).
B160	06/10/24	L. Foody	0.40	Revise parties in interest list for conflicts search (.4).
B160	06/10/24	E. Keil	5.00	Revise retention applications (2.3); revise PII list (.3); correspondence with L. Petry re all-firm email (.3); correspondence with all MWE list serve re same (.2); revise OCP motion (.6); draft bar date motion (.9); conference with R. Trickey re Stout retention application (.1); revise same (.3).
B160	06/11/24	L. Foody	0.30	Review conflicts results (.1); revise retention application (.2).
B160	06/11/24	E. Keil	0.20	Correspondence with A. Masotta re retention application (.2).
B160	06/11/24	D. Simon	1.30	Review and revise retention applications (1.3).
B160	06/13/24	L. Foody	0.20	Revise retention applications re UCC appointment (.2).
B160	06/14/24	L. Foody	0.90	Revise MWE retention application conflicts (.9).
B160	06/14/24	D. Simon	1.20	Review and revision of various retention applications (1.2).
B160	06/17/24	E. Keil	0.50	Draft notices re retention applications (.4); correspondence with A. Dalsass re Ankura retention application (.1).
B160	06/17/24	L. Foody	0.30	Revise MWE retention application (.3).
B160	06/18/24	R. Trickey	0.50	Revise Stout employment application (.4); correspond with Stout team and E. Keil re same (.1).
B160	06/18/24	L. Foody	1.70	Revise MWE retention application (1.0); revise



LaVie Care Centers, LLC

Client: 120098  
Invoice: 3919213  
Invoice Date: 08/27/24

Task	Date	Name	Hours	Description
				conflicts report (.7).
B160	06/18/24	E. Keil	4.20	Revise retention applications (2.5); conference with A. Dalsass, J. Brilliant, et al. re OCP (.5); revise OCP motion (.8); revise PII list (.4).
B160	06/18/24	D. Simon	1.70	Review and revise retention applications (1.7).
B160	06/19/24	R. Trickey	0.20	Revise Stout retention application (.2).
B160	06/19/24	L. Foody	1.40	Multiple correspondence with D. Simon, E. Keil, and A. Cruz re MWE retention application (.3); revise MWE retention application (.6); revise Ankura retention application (.5).
B160	06/19/24	D. Simon	1.50	Further revisions to all retention applications (1.5).
B160	06/19/24	E. Keil	2.30	Correspondence with Company re OCP list (.2); conference with J. Brilliant re same (.3); revise motion re same (.5); revise Chapman retention application (.9); draft notice re same (.1); conference with D. Simon re retention applications (.3).
B160	06/20/24	R. Trickey	0.30	Review correspondence from Stout and E. Keil re Stout retention application (.2); revise Stout retention application (.1).
B160	06/20/24	L. Foody	3.10	Revise MWE retention application (2.7); process additional conflicts requests (.4).
B160	06/20/24	E. Keil	1.20	Revise retention applications (1.2).
B160	06/21/24	R. Trickey	0.60	Finalize Stout retention application for filing (.6).
B160	06/21/24	L. Foody	0.60	Review and revise MWE retention application in preparation for filing (.6).
B160	06/21/24	E. Keil	1.30	Revise retention applications (1.0); conference with A. Marchant-Lessa re same (.3).
B160	06/21/24	D. Northrop	0.10	Conference with E. Keil re timing issues relating to filing Debtor professional retention applications and preparations for second-day hearing on 6.27.24 (.1).
B160	06/21/24	D. Simon	0.60	Final review and discussions re modifications to retention applications (.6).
B160	06/23/24	E. Keil	1.80	Revise bar date motion (1.4); revise OCP motion (.4).
B160	06/24/24	E. Keil	1.30	Conference with A. Dalsass re Ankura retention application (.3); revise same (.7); correspondence re same with Ankura team (.1); revise notices of retention applications re same (.2).
B160	06/25/24	D. Northrop	2.50	Review Debtors' applications to retain McDermott Will & Emery LLP, Ankura Consulting Group LLC,





LaVie Care Centers, LLC

Client: 120098  
Invoice: 3919213  
Invoice Date: 08/27/24

Task	Date	Name	Hours	Description
				Stout Capital LLC, and Chapman & Cutler LLP, and Debtors' motion to employ and pay ordinary course professionals (.6); communications with E. Keil re proposed revisions to certain schedules to the declarations in support of the retention applications (.3); file four Debtor retention applications and Debtors' motion to employ and pay ordinary course professionals on the ECF case docket (1.1); upload proposed orders for four Debtor retention applications and Debtors' motion to employ and pay ordinary course professionals via the ECF order upload function (.5).
B160	06/25/24	E. Keil	2.60	Revise Ankura retention application and prepare for filing (.9); revise MWE retention application and prepare for filing (.7); revise Stout retention application and prepare for filing (.4); revise Chapman retention application and prepare for filing (.3); conference with A. Marchant-Lessa re orders for same (.3).
B160	06/27/24	E. Keil	1.90	Revise notice of hearing re OCP motion (.4); correspondence with A. Marchant-Lessa re same (.2); revise retention orders re Judge Baisier comments (1.3).
B160	06/28/24	D. Northrop	0.40	Review orders entered 6.28.24 granting Debtors' applications to retain McDermott Will & Emery LLP, Ankura Consulting Group LLC, Stout Capital LLC, and Chapman & Cutler LLP (.3); correspondence with MWE team re same (.1).
B190	06/03/24	M. Khurana	1.10	Draft notice of suggestion of bankruptcy in MileStone case (.6); revise adversary complaint and brief in support of extension of automatic stay to non-debtor parties (.5).
B190	06/03/24	H. Putre	1.40	Draft notice of suggestion of bankruptcy re Healthcare Negligence Recovery Corp. (1.1); confer with N. Bull re same (.3).
B190	06/03/24	E. Keil	4.50	Revise litigation and stay notices (.4); revise motion for extension of stay, declaration in support of same (2.1); review and revise brief in support of same (.4); review and revise complaint re same (.3); conference with N. Bull re same (.2);



LaVie Care Centers, LLC

Client: 120098  
Invoice: 3919213  
Invoice Date: 08/27/24

Task	Date	Name	Hours	Description
				correspondence with Ankura team re UST inquiries (.3); conferences with same re same (.6); conference with A. Dalsass, R. Ahmed re MORs (.2).
B190	06/04/24	J. Haake	4.90	Prepare for and participate in conference with US Trustee re first-day hearing (1.0); conference with D. Simon, E. Keil and Ankura team to prepare for first-day hearing (3.9).
B190	06/04/24	C. Lee	0.50	Research case law re adversary complaint (.5).
B190	06/04/24	M. Khurana	0.50	Review and cite check case law in adversary complaint and brief in support of motion for extension of stay (.5).
B190	06/04/24	E. Keil	2.70	Conference with J. Adams, L. Kolba, et al. re UST comments to first-day orders (1.0); revise first-day orders to resolve same (1.3); correspondence with J. Adams, L. Kolba, et al. re revised first-day orders (.4).
B190	06/04/24	D. Simon	1.90	Conference with UST re first-day orders (1.1); follow up discussions with team re revisions (.8).
B190	06/05/24	D. Simon	1.80	Conference with litigation team re open investigation issues (.5); multiple conferences with client re open litigation issues and prep (1.3).
B190	06/05/24	E. Keil	0.30	Correspondence with H. Udow, J. Haims re investigation materials (.3).
B190	06/06/24	J. Haake	0.50	Conference with D. Simon, E. Keil, and J. Jumbeck re second-day issues and strategy (.5).
B190	06/07/24	E. Keil	0.60	Review and revise Brandon litigation letter (.6).
B190	06/07/24	D. Simon	3.10	Multiple conferences with B. Jones, C. Bryson and D. Dias re corporate governance, investigation issues (2.3); conferences with J. Haims and Chapman re same (.4); revisions to Bittman letter (.4).
B190	06/10/24	D. Simon	1.50	Multiple conferences and analysis with J. Haims and client re investigation (.7); multiple conferences with D. Dias and C. Bryson re same (.8).
B190	06/11/24	E. Keil	6.10	Conference with D. Simon, B. Jones, et al. re UCC data room (.4); compile and review materials re same (5.7).
B190	06/11/24	D. Simon	4.30	Conference with investigation team and J. Decker (1.0); multiple conferences with B. Jones and J. Haims re same (.8); conferences with C. Bryson and





LaVie Care Centers, LLC

Client: 120098  
Invoice: 3919213  
Invoice Date: 08/27/24

Task	Date	Name	Hours	Description
				D. Dias re same (.7); conferences with Ankura team re Committee data room (.5); review and revise adversary pleadings (1.3).
B190	06/12/24	M. Khurana	3.10	Conference with N. Bull, E. Keil, C. Lee, D. Simon re revisions to adversary complaint and brief in support of adversary complaint (1.1); revise adversary complaint (2.0).
B190	06/12/24	C. Lee	5.80	Conference with D. Simon, MWE team re adversary complaint (1.0); review and revise brief in support of same (1.4); research legal issues re same (2.2); review and analyze diligence re same (.8); correspond with E. Keil, MWE team re same (.4).
B190	06/12/24	E. Keil	7.00	Conference with N. Bull, D. Simon, et al. re adversary complaint (1.0); review contracts re indemnification obligations re same (2.5); correspondence with C. Lee re same (.2); continue to prepare UCC data room (3.3).
B190	06/12/24	D. Simon	2.70	Multiple conferences and correspondence re investigation issues and related litigation matters (1.5); attend conference re adversary proceeding (1.2).
B190	06/13/24	J. Haake	0.50	Conference with Ankura team re strategy (.5).
B190	06/13/24	C. Lee	6.30	Review and revise brief in support of adversary complaint (1.7); conference with E. Keil re same (.9); research legal issues re same (1.4); review and analyze diligence re same (1.8); correspond with E. Keil, MWE team re same (.4); conference with M. Khurana re same (.1).
B190	06/13/24	M. Khurana	4.40	Revise adversary complaint (4.4).
B190	06/13/24	E. Keil	5.80	Conferences with D. Simon re UCC data room (.6); continue to prepare materials re same (3.5); conference with C. Lee re adversary pleadings (1.1); revise same (.6).
B190	06/13/24	D. Simon	2.10	Multiple conferences with B. Jones, J. Decker and others re investigation issues (1.4); finalize data room issues (.7).
B190	06/14/24	C. Lee	0.80	Correspond with E. Keil, M. Khurana re adversary proceeding pleadings (.3); review and revise same (.5).
B190	06/14/24	E. Keil	6.30	Revise brief in support of extension of stay (3.2);



LaVie Care Centers, LLC

Client: 120098  
Invoice: 3919213  
Invoice Date: 08/27/24

Task	Date	Name	Hours	Description
				revise complaint re same (1.1); revise motion re same (.4); revise declaration in support re same (1.4); conference with D. Simon re same (.2).
B190	06/14/24	E. Kwon	0.80	Identify additional potentially relevant documents for case development review (.5); coordinate preparing same to review in the discovery document repository (.3).
B190	06/14/24	D. Simon	4.00	Conference with J. Anthony and others re stay issues (.5); conference re doc review (.5); multiple conferences with investigatory team (1.2); review investor portal and related documents (1.8).
B190	06/16/24	E. Keil	1.50	Revise brief in support of motion to extend stay (.6); revise complaint re same (.3); revise declaration re same (.4); revise motion re same (.2).
B190	06/17/24	E. Keil	0.30	Correspondence with UCC re data room access (.3).
B190	06/17/24	D. Simon	3.40	Participate in investigation session at Synergy (2.0); multiple conferences with MWE team re litigation and discovery (1.0); multiple conferences with D. Dias and N. Bull re open litigation matters (.4).
B190	06/18/24	J. Haake	0.30	Correspondence with J. Adams re final orders (.3).
B190	06/18/24	E. Keil	3.90	Review UCC document requests (.5); correspondence with D. Simon, R. Ahmed, et al. re same (.4); prepare responses to same (2.7); conference with R. Ahmed re same (.3).
B190	06/18/24	D. Simon	1.30	Multiple conferences re investigation efforts (.8); review and analyze privilege and discovery issues (.5).
B190	06/19/24	J. Haake	5.50	Prepare for and participate in conference with D. Kovsky, A. Saltzman, and N. Ganti re second-day hearing and final orders (1.4); correspondence with D. Simon re final orders and strategy (.5); revise final orders to incorporate comments (1.1); correspondence with E. Keil re orders and strategy (.4); correspondence with T. Brink and A. Dalsas re second-day orders (.6); conference with D. Simon and N. Bull re UCC discovery requests and strategy (1.5).
B190	06/19/24	J. Jumbeck	1.10	Conference with Troutman team, Ankura team, FTI team, and MWE team re UCC introduction and issues with first-days (1.1).



LaVie Care Centers, LLC

Client: 120098  
Invoice: 3919213  
Invoice Date: 08/27/24

Task	Date	Name	Hours	Description
B190	06/19/24	D. Simon	1.30	Review and revision of adversary materials, and conferences relating to same (.7); multiple conferences with investigation team re back-up and next steps (.6).
B190	06/19/24	E. Keil	5.60	Conferences with B. Jones, R. Ahmed, G. Hayes, et al. re UCC document requests (1.6); conference with N. Bull, D. Simon re same (.3); conferences with B. Jones, R. Ahmed, et al. re UCC first-day concerns (1.2); draft responses re same and compile information for data room (1.4); prepare revised final orders for UCC review (1.1).
B190	06/20/24	J. Haake	1.00	Prepare for and participate in conference with D. Simon and Ankura team re strategy (.6); correspondence with E. Keil re strategy and administrative issues (.4).
B190	06/20/24	C. Lee	2.40	Research re state court litigation, automatic stay (.3); correspond with N. Bull, MWE team re same (.1); review and revise pleadings for adversary proceeding to extend the automatic stay (1.8); correspond with E. Keil, MWE team re same (.2).
B190	06/20/24	D. Simon	2.50	Multiple conferences and analysis re investigation matters (2.2); communications re adversary complaint (.3).
B190	06/20/24	E. Keil	7.70	Conferences with D. Simon re UCC requests (.5); correspondence and conferences with R. Ahmed re same (1.1); prepare responses re same and populate data room re same (3.3); conference with N. Bull re same (.7); conference with T. Cramton, et al. re same (.4); draft correspondence with J. Adams re MOR issue (.4); revise adversary documents re extension of stay (1.3).
B190	06/20/24	A. Sieber	0.20	Research and retrieve case information re pending civil case against Debtor in Virginia state court (.2).
B190	06/21/24	C. Lee	0.10	Research complaint, plaintiff counsel re potential automatic stay violation (.1).
B190	06/21/24	E. Keil	4.80	Revise adversary complaint re extension of stay (.7); revise brief in support of same (1.5); revise declaration re same (.8); revise motion re same (.6); compile responses for UCC requests and populate data room (1.2).



LaVie Care Centers, LLC

Client: 120098  
Invoice: 3919213  
Invoice Date: 08/27/24

Task	Date	Name	Hours	Description
B190	06/21/24	D. Simon	2.30	Conference with investigation team re various issues (1.0); multiple follow up conferences re same (.8); review and comment on adversary pleadings (.5).
B190	06/21/24	A. Sieber	0.10	Research re pending litigation (.1).
B190	06/22/24	E. Keil	2.50	Correspondence with Company, Ankura team re UCC requests (.3); revise proposed responses re same (.5); correspondence with J. Mikhailevich re UCC data room (.2); compile responsive documents for same (1.5).
B190	06/22/24	D. Simon	0.60	Multiple correspondence re email and privilege issues (.3); conference with J. Muenker re same (.3).
B190	06/23/24	E. Keil	0.30	Correspondence with F. Lawall, D. Kovak-Apap re UCC data requests (.3).
B190	06/23/24	D. Simon	1.20	Conference with J. Haims and N. Bull re email privilege and related issues (.4); conference with investigation team re same (.8).
B190	06/24/24	C. Lee	0.40	Review and revise brief in support of automatic stay extension (.3); correspond with E. Keil, MWE team re same (.1).
B190	06/24/24	J. Jumbeck	1.00	Conference with MWE team re response to Committee objection (.4); conference with MWE team, Ankura team, Independent Director team, and Company team re current status (.6).
B190	06/24/24	D. Simon	6.40	Multiple correspondence and conferences re hearing preparation and related issues (3.5); multiple conferences re investigation and related issues (1.2); multiple conferences with D. Dias and J. Muenker re same (.5); review and analysis of objections (1.2).
B190	06/24/24	J. Haake	1.10	Prepare for and participate in conference with D. Simon, E. Keil, B. Jones, and M. Krakovsky re strategy in anticipation of second-day hearing (.5); correspondence with J. Brilliant and J. Adams re cash management order and revise order (.6).
B190	06/24/24	E. Keil	4.00	Review UCC objections (1.3); draft reply re same (1.0); revise adversary complaint and brief (1.2); compile responsive documents re UCC requests (.5).
B190	06/25/24	C. Lee	1.20	Draft automatic stay enforcement letter (.7); research legal issues re same (.2); correspond with N. Bull, MWE team re same (.1); correspond with Company re same (.2).



LaVie Care Centers, LLC

Client: 120098  
Invoice: 3919213  
Invoice Date: 08/27/24

Task	Date	Name	Hours	Description
B190	06/25/24	J. Haake	1.30	Prepare for and participate in conference with D. Simon and B. Jones re strategy and second-day hearing (.9); conference with J. Jumbeck re second-day hearing issues (.4).
B190	06/25/24	E. Keil	9.20	Conference with B. Jones, R. Ahmed, et al. re UCC objections (.5); conference with J. Haake, J. Jumbeck re same (.6); draft reply to same (3.8); research re same (1.0); conference with MWE team re same (1.0); conference with F. Lawall, et al. re objections (.9); conferences with J. Adams re MOR issue (.4); revise org chart re UST request (1.0).
B190	06/25/24	D. Simon	11.80	Multiple conferences and revisions to omnibus reply (1.5); draft and revise same (2.0); conference with UST re open issues in advance of hearing (.4); multiple conferences with Ankura team re hearing preparation and related issues (4.2); multiple conferences with Committee re open issues (1.8); multiple conferences with K. Coniglio and others re DIP priorities (.4); draft and revise witness outline (1.5).
B190	06/26/24	J. Haake	5.40	Prepare for second-day hearing (1.6); revise orders and create redlines for hearing, and correspondence with E. Keil re same (2.1); correspondence with J. Adams re orders (.7); correspondence with KCC re service of notices and publication of auction notice (1.0).
B190	06/26/24	C. Lee	2.40	Conference with plaintiff's counsel re violation of automatic stay (.6); correspond with D. Simon, MWE team re same (.2); review and revise pleadings re extension of automatic stay (1.5); correspond with E. Keil, MWE team re same (.1).
B190	06/26/24	E. Keil	7.40	Revise reply re UCC objections (4.6); conference with B. Jones, G. Hayes, et al. re same (.4); correspondence with US Trustee, Ankura team re MOR issue (.4); revise order language re same (.3); conference with MWE litigation team re status update (.4); revise org chart re UST request (1.0); correspondence with R. Dowdy re same (.3).
B190	06/26/24	D. Simon	4.00	Meetings with DIP lenders and others re settlement and potential issues (.8); review and finalize



LaVie Care Centers, LLC

Client: 120098  
Invoice: 3919213  
Invoice Date: 08/27/24

Task	Date	Name	Hours	Description
				omnibus reply (1.5); review and comment on all second-day orders, including DIP (1.3); draft and revise Krakovsky proffer (.4).
B190	06/27/24	C. Lee	0.30	Compile exhibits to adversary proceeding pleadings (.2); correspond with E. Keil, KCC team re same (.1).
B190	06/27/24	D. Simon	1.10	Revisions to adversary complaint and related pleadings (.4); conference with B. Jones and N. Bull re same (.3); conference with J. Muenker re same (.4).
B190	06/28/24	C. Lee	1.80	Review and revise pleadings re extension of automatic stay (1.4); correspond with N. Bull, MWE team re same (.3); correspond with plaintiff counsel re same (.1).
B190	06/28/24	D. Simon	0.50	Review and comment on adversary materials (.5).
B190	06/30/24	C. Lee	4.60	Review and revise pleadings re extension of automatic stay (3.7); correspond with N. Bull, MWE team re same (.6); conference with J. Jones re filing of same (.2); correspond with KCC re service of same (.1).
B190	06/30/24	D. Simon	0.80	Multiple correspondence re adversary (.3); review and revise same (.5).
B190	06/30/24	E. Keil	1.50	Revise adversary pleadings, including complaint, brief, and motion (1.2); correspondence with C. Lee, D. Simon, et al. re same (.3).
B195	06/04/24	D. Simon	1.00	Travel to/from for first-day hearing (Atlanta, GA to Newnan - travel time reduced by 50%) (1.0).
B195	06/05/24	E. Keil	2.20	Travel from Atlanta, GA to Chicago, IL (travel time reduced by 50%) (2.2).
B195	06/26/24	J. Jumbeck	2.30	Travel from Chicago, IL to Atlanta, GA for second-day hearing (travel time reduced by 50%) (2.3).
B195	06/26/24	J. Haake	2.30	Travel to Atlanta for second-day hearing (travel time reduced by 50%) (2.3).
B195	06/28/24	J. Haake	2.00	Return travel from Atlanta (travel time reduced by 50%) (2.0).
B195	06/29/24	J. Jumbeck	2.30	Travel from Atlanta, GA to Chicago, IL after second-day hearing (travel time reduced by 50%) (2.3).
B210	06/02/24	J. Haake	4.30	Revise draft first-day pleadings and prepare for first-day hearing in anticipation of filing bankruptcy





LaVie Care Centers, LLC

Client: 120098  
Invoice: 3919213  
Invoice Date: 08/27/24

Task	Date	Name	Hours	Description
				(4.3).
B210	06/02/24	L. Foody	2.50	Review and revise patient confidentiality motion (.3); prepare same for filing (.2); draft hearing outline re same (.6); review and revise resident programs motion (.5); prepare same for filing (.2); draft hearing outline re same (.7).
B210	06/02/24	E. Keil	1.40	Conference with B. Jones, A. Dalas, D. Simon, et al. re first-days (.2); review and finalize schedules and statements extension motion for filing (.3); correspondence with D. Northrop re same (.1); review and finalize resident programs motion for filing (.2); correspondence with D. Northrop re same (.1); review and finalize resident care vendors motion for filing (.4); correspondence with D. Northrop re same (.1).
B210	06/02/24	D. Northrop	0.90	File Debtors' emergency motion for interim and final orders authorizing the implementation of procedures to maintain and protect resident confidential health information as required by applicable privacy rules (.3); file Debtors' emergency motion for interim and final orders authorizing Debtors to maintain and continue resident programs and honor prepetition obligations related thereto (.3); file Debtors' emergency motion for interim and final orders authorizing payment of prepetition obligations owed to resident care vendors (.3).
B210	06/03/24	J. Haake	4.60	Multiple conferences with G. Hayes, K. Ussery, K. Dalsass, and J. Brilliant re cash management system (2.4); draft and prepare letters to send to banks (1.6); review and revise motion to seal confidential information (.6).
B210	06/03/24	L. Foody	0.40	Revise motion to seal confidential information orders (.3); revise motion to seal confidential information hearing outline (.1).
B210	06/03/24	E. Keil	0.40	Review and finalize cash management motion, exhibits for filing (.3); correspondence with D. Northrop re same (.1).
B210	06/03/24	D. Simon	2.80	Multiple correspondence with Company and Ankura re various operational and filing issues (2.8).
B210	06/03/24	D. Northrop	0.20	File Debtors' motion for interim and final cash



LaVie Care Centers, LLC

Client: 120098  
Invoice: 3919213  
Invoice Date: 08/27/24

Task	Date	Name	Hours	Description
				management orders on the ECF case docket (.2).
B210	06/04/24	L. Foody	0.10	Revise resident programs interim order (.1).
B210	06/04/24	E. Keil	0.30	Revise interim cash management order (.2); correspondence with D. Northrop re filing of same (.1).
B210	06/05/24	L. Foody	1.50	Compile business requirements from interim orders and draft chart re same (1.5).
B210	06/05/24	D. Simon	2.40	Multiple conferences and correspondence with client re operational disruption and related issues (1.8); conferences re company communications materials and related issues (.6).
B210	06/05/24	D. Northrop	0.30	Review interim order, entered 6.5.24 authorizing the implementation of procedures to maintain and protect confidential health information as required by applicable privacy rules, and correspondence with MWE team re same (.1); review interim order, entered 6.5.24 authorizing Debtors to maintain and continue resident programs, honor prepetition obligations related thereto, and correspondence with MWE team re same (.1); review interim order, entered 6.5.24 authorizing Debtors to continue to operate their existing cash management system and granting related relief, and correspondence with MWE team re same (.1).
B210	06/06/24	J. Haake	0.40	Conference with Ankura and D. Simon re banking issues (.4).
B210	06/06/24	D. Simon	2.10	Numerous conferences re DACA and new operator issues (1.3); correspondence re same (.4); conference with Ankura re MidCap issues (.4).
B210	06/06/24	E. Keil	1.10	Revise resident letter (.4); conference with S. Reitzel re same (.2); correspondence with Debtors re interim order obligations (.2); conference with A. Dalsass re resident service, schedules and statements (.3).
B210	06/07/24	E. Keil	1.00	Correspondence with Debtors, R. Ahmed, et al. re IDI requests (.4); compile same (.6).
B210	06/07/24	J. Haake	1.30	Correspondence with E. Keil and Ankura re information for US Trustee interview (.8); correspondence and conference with C. Chrispell re employee issues for US Trustee interview (.5).
B210	06/10/24	E. Keil	1.30	Conference with A. Dalsass, G. Hayes, et al. re





LaVie Care Centers, LLC

Client: 120098  
Invoice: 3919213  
Invoice Date: 08/27/24

Task	Date	Name	Hours	Description
				schedules and statements (1.0); conference with R. Ahmed, B. Jones, et al. re IDI (.3).
B210	06/10/24	D. Simon	0.60	Multiple correspondence with Debtors re operational questions and issues (.6).
B210	06/12/24	J. Haake	1.60	Analysis of patient privacy and operational issues, and correspondence with D. Simon re same (1.0); prepare for and participate in conference with J. Jumbeck and L. Burton re cash management issues (.6).
B210	06/12/24	E. Keil	3.40	Prepare responses for US Trustee re IDI (1.8); correspondence with D. Simon, B. Jones, et al. re same (.3); draft correspondence with R. Dowdy, J. Adams, et al. re same (.4); conferences with R. Ahmed, D. Simon re same (.9).
B210	06/12/24	D. Simon	1.50	Multiple conferences with HSG and other vendors (.4); multiple conferences with Ankura re same (.6); review and analyze CMPs and related issues (.5).
B210	06/13/24	J. Haake	1.30	Analysis of gas card issues and correspondence with S. Brazill re same (1.3).
B210	06/13/24	E. Keil	2.10	Conference with J. Decker, B. Jones, et al. re status update (.4); conference with A. Dalsass, K. Ussery, et al. re schedules and statements (1.0); conference with S. Reitzel re same (.2); conference with J. Adams, D. Simon re MORs (.2); correspondence with B. Jones, et al. re IDI (.3).
B210	06/14/24	E. Keil	1.00	Conference with B. Jones, R. Perry, et al. re IDI preparation (1.0).
B210	06/17/24	E. Keil	4.20	Conference with R. Dowdy, D. Jackson, et al. re IDI (2.0); correspondence with same re IDI requests (.3); correspondence with G. Hayes, R. Ahmed, et al. re same (.5); prepare responses re same (1.2); correspondence with J. Watson re org chart re same (.2).
B210	06/17/24	J. Haake	4.50	Prepare for and attend initial Debtor interview (2.1); revise final orders to incorporate comments from various parties (1.0); conference with C. Lee re insurance issues and final order re same (.5); conference with J. Brilliant re bank accounts and noticing information (.4); correspondence with notice parties re closing accounts (.5).



LaVie Care Centers, LLC

Client: 120098  
Invoice: 3919213  
Invoice Date: 08/27/24

Task	Date	Name	Hours	Description
B210	06/18/24	J. Haake	1.00	Conference with D. Abadir re Wells Fargo cash management and correspondence with J. Jumbeck re same (1.0).
B210	06/19/24	J. Haake	0.40	Correspondence with J. Jumbeck and K. Stevens re cash management order (.4).
B210	06/19/24	L. Foody	1.10	Revise resident care program final order in preparation for hearing (.5); revise patient confidentiality final order in preparation for hearing (.6).
B210	06/20/24	J. Haake	1.40	Prepare for and participate in conference with K. Stevens re cash management order (.4); revise same (.3); conference and correspondence with D. Abadir re same (.5); correspondence with J. Jumbeck re cash management issues (.2).
B210	06/20/24	D. Simon	1.50	Multiple conferences re operational issues (.6); review and analysis of regulatory matters (.9).
B210	06/21/24	M. Wallace	2.00	Conferences re bankruptcy and Medicare CHOW considerations (.5); review Medicare regulations and manuals (1.5).
B210	06/21/24	E. Keil	1.50	Conference with D. Simon, J. Decker, et al. re status update (1.0); additional conference with D. Simon re same (.5).
B210	06/21/24	D. Simon	1.80	Review and analyze regulatory issues (1.2); conference with M. Wallace, E. Keil and others re same (.6).
B210	06/24/24	E. Keil	3.60	Conference with Ankura team re schedules and statements (.5); conference with J. Decker, B. Jones, et al. re status update (.6); conferences with D. Simon re same (.4); draft notices of proposed final order re cash management, taxes, refund programs, resident confidentiality, insurance, wages, etc. (2.1).
B210	06/25/24	L. Foody	2.10	Research re consolidated MOR filing (2.1).
B210	06/26/24	E. Keil	3.30	Revise and finalize proposed final orders in advance of second-day hearing (3.1); correspondence with A. Marchant-Lessa re same (.2).
B210	06/26/24	G. Fosheim	0.60	Discuss Medicare provider number matters with J. Haake (.6).
B210	06/27/24	E. Keil	2.20	Revise proposed orders re second-day hearing (1.8); correspondence with A. Marchant-Lessa re same (.4).



LaVie Care Centers, LLC

Client: 120098  
Invoice: 3919213  
Invoice Date: 08/27/24

Task	Date	Name	Hours	Description
B210	06/28/24	J. Haake	0.60	Conference with J. Brilliant and K. Ussery re cash management issues (.6).
B210	06/28/24	E. Keil	0.50	Conference with J. Brilliant re schedules/statements (.3); conference with D. Simon re status update (.2).
B210	06/28/24	D. Northrop	0.10	Review order entered 6.28.24 authorizing appointment of patient care ombudsperson, and correspondence with MWE team re same (.1).
B220	06/03/24	E. Keil	0.50	Revise and finalize employee motion for filing (.4); correspondence with D. Northrop re same (.1).
B220	06/03/24	D. Northrop	0.20	File Debtors' emergency motion for interim and final orders authorizing Debtors to (i) pay prepetition wages, compensation, employee benefits, and (ii) continue certain employee benefit programs in the ordinary course on the ECF case docket (.2).
B220	06/04/24	E. Keil	0.30	Revise employee interim order (.2); correspondence with D. Northrop re uploading same (.1).
B220	06/05/24	D. Northrop	0.10	Review interim order, entered 6.5.24 authorizing Debtors to (i) pay prepetition wages, compensation, employee benefits, (ii) continue certain employee benefit programs in the ordinary course, (iii) granting related relief, and correspondence with MWE team re same (.1).
B220	06/13/24	R. Trickey	1.60	Research issues re [REDACTED] (1.6).
B220	06/14/24	R. Trickey	7.10	Research and analyze issues re [REDACTED] (5.1); conference with J. Haake re same (.1); research and analyze issues re [REDACTED] (1.9).
B220	06/14/24	J. Haake	1.10	Correspondence with J. Pyron and R. Trickey re employee benefits issue (.4); research of same (.7).
B220	06/18/24	R. Trickey	2.10	Research issues re [REDACTED] (1.8); correspond with C. Lee re same (.3).
B220	06/18/24	C. Lee	0.80	Conference with J. Haake, Company re workers compensation (.4); review and revise first-day orders (.4).
B230	06/03/24	J. Jumbeck	4.60	Review current form of interim DIP order (.8); review DIP motion (.6); prepare talking points for interim DIP hearing (1.9); prepare for interim DIP hearing (.5); correspondence with Goodwin team



LaVie Care Centers, LLC

Client: 120098  
Invoice: 3919213  
Invoice Date: 08/27/24

Task	Date	Name	Hours	Description
				and DLA team re interim DIP order and borrowings (.8).
B230	06/03/24	E. Keil	0.80	Revise and finalize DIP motion, order, exhibits for filing (.4); correspondence with D. Northrop re same (.1); review and finalize DIP declaration for filing (.2); correspondence with D. Northrop re same (.1).
B230	06/03/24	D. Northrop	0.40	File (i) Debtors' emergency motion for interim and final orders authorizing Debtors to obtain postpetition financing and utilize cash collateral and (ii) Krakovsky declaration in support of Debtors' DIP motion on the ECF case docket (.4).
B230	06/04/24	J. Hunt	1.30	Conference with J. Jumbeck re DIP financing (.3); review DIP motion and interim DIP order (1.0).
B230	06/04/24	J. Jumbeck	0.50	Revise interim DIP order (.5).
B230	06/04/24	E. Keil	0.40	Revise interim DIP order (.3); correspondence with D. Northrop re uploading same (.1).
B230	06/05/24	S. Scaletta	2.00	Correspondence with J. Hunt re deal onboarding (.3); correspondence with J. Hunt and J. Jumbeck re deal deliverables and timeline (.4); draft Security Agreement (1.0); attention to ancillary financing deliverables (.3).
B230	06/05/24	J. Hunt	4.90	Review lender draft of DIP credit agreement (3.5); review interim DIP order (.7); review closing checklist (.2); conference with J. Jumbeck and S. Scaletta re loan documentation (.5).
B230	06/05/24	J. Jumbeck	4.00	Revise interim DIP order (.8); conference with D. Simon re same (.2); conference with PR team, VP team, and D. Simon re cash collection (.2); conference with J. Hunt and S. Scaletta re DIP loan documents (.4); correspondence with J. Hunt and S. Scaletta re same (.3); correspondence with PR team and VP team re cash collections (.2); research re precedent DIP objections (1.3); prepare DIP objection reply shell (.6).
B230	06/05/24	E. Keil	0.80	Correspondence with A. Marchant-Lessa re interim DIP order (.2); correspondence, conferences with J. Jumbeck, D. Simon re same (.3); correspondence with D. Northrop re uploading same (.1); correspondence with S. Scaletta re DIP credit agreement (.2).



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LaVie Care Centers, LLC

Client: 120098  
Invoice: 3919213  
Invoice Date: 08/27/24

Task	Date	Name	Hours	Description
B230	06/05/24	D. Simon	2.90	Multiple communications with court/lenders re revisions to DIP documents (.8); multiple conferences with client re MidCap and funding issues (1.2); conference with MidCap re same (.3); review and analyze documents relating to same (.6).
B230	06/05/24	D. Northrop	0.30	Prepare revised proposed interim DIP order in the proper format for uploading through the Court's order upload function in ECF (.1); upload revised proposed interim DIP order using the ECF order upload function (.1); review revised proposed interim DIP order entered on 6.5.24 and correspondence with MWE team re same (.1).
B230	06/06/24	S. Scaletta	1.80	Attention to ancillary financing deliverables (.4); attention to administrative matters re same (.5); conference with A. Requejado and J. Hunt to discuss financing deal and administrative matters (.3); draft Omnibus Florida Secretary's Certificate (.5); correspondence with J. Hunt re the aforementioned (.1).
B230	06/06/24	J. Hunt	7.30	Review and comment on lender draft of DIP credit agreement (6.8); conference with S. Scaletta and A. Requejado re Debtor diligence in connection with DIP facility (.5).
B230	06/06/24	A. Requejado	2.50	Correspondence and conference with J. Hunt and S. Scaletta re logistics (.5); review diligence documents and entity spreadsheet re DIP financing (2.0).
B230	06/06/24	J. Jumbeck	7.20	Review draft of DIP credit agreement (1.1); revise same (2.8); coordinate review and delivery of lender due diligence materials (2.6); conference with Ankura team and MWE team re account sweep matters (.7).
B230	06/07/24	S. Scaletta	0.20	Review and analyze ancillary financing deliverables (.2).
B230	06/07/24	J. Hunt	4.90	Review and comment on lender draft of DIP credit agreement (4.9).
B230	06/07/24	A. Requejado	2.80	Correspondence with CT Corporation re estimate for certified corporate documents (.6); correspondence with MWE team re same (.4); continue review of corporate documents and update chart (1.8).
B230	06/07/24	E. Keil	0.60	Correspondence with L. Foody, J. Jumbeck re DIP



LaVie Care Centers, LLC

Client: 120098  
Invoice: 3919213  
Invoice Date: 08/27/24

Task	Date	Name	Hours	Description
				diligence (.4); correspondence with J. Watson re same (.2).
B230	06/07/24	L. Foody	5.10	Conference with J. Jumbeck re DIP diligence (.3); prepare DIP diligence and document list for transfer (4.8).
B230	06/07/24	J. Jumbeck	3.40	Revise DIP credit agreement draft (2.2); review DIP security agreement draft (1.2).
B230	06/08/24	E. Keil	0.60	Compile diligence requests re DIP (.6).
B230	06/08/24	J. Jumbeck	2.40	Revise DIP credit agreement (2.2); correspond with MWE team re same (.1); correspond with GP team and DLA team re same (.1).
B230	06/09/24	J. Hunt	0.50	Review J. Jumbeck updates to DIP credit agreement (.5).
B230	06/09/24	E. Keil	0.40	Correspondence with J. Jumbeck re DIP diligence (.4).
B230	06/09/24	D. Simon	0.40	Review and revise financing documents (.4).
B230	06/10/24	J. Hunt	2.40	Review and comment on draft of DIP security agreement (2.4).
B230	06/10/24	J. Jumbeck	3.50	Review draft of DIP security agreement (1.2); revise same (.3); review precedent re same (.2); multiple correspondence with MWE team re precedent for DIP loan documents (.4); coordinate delivery of responsive diligence materials re DIP lender diligence requests (1.4).
B230	06/10/24	A. Requejado	4.40	Continue review of corporate documents and update chart re DIP (3.7); correspondence with CT Corporation re DIP estimate for remaining entities (.7).
B230	06/11/24	S. Scaletta	3.40	Conference with J. Hunt and J. Jumbeck re Credit Agreement Schedules (.4); draft Credit Agreement Schedules (3.0).
B230	06/11/24	J. Hunt	0.60	Conference with J. Jumbeck and S. Scaletta re loan document schedules (.4); update draft of DIP security agreement and circulate to DIP lenders (.2).
B230	06/11/24	J. Jumbeck	6.90	Draft and revise schedules to DIP credit agreement (3.2); draft and revise schedules to security agreement (1.3); draft DIP resolutions (.6); coordinate execution of omnibus secretary's certificate (.8); conference with J. Hunt and S. Scaletta re DIP credit agreement schedules (.2);





LaVie Care Centers, LLC

Client: 120098  
Invoice: 3919213  
Invoice Date: 08/27/24

Task	Date	Name	Hours	Description
				correspondence with MWE team re cash management sweeps (.4); correspondence with Ankura team re same (.4).
B230	06/11/24	A. Requejado	7.00	Continue review of corporate documents and update chart re DIP (7.0).
B230	06/11/24	D. Simon	0.90	Revisions to DIP transaction protocol (.4); conference with J. Muenker re same (.5).
B230	06/12/24	J. Hunt	0.30	Review draft authorizing resolutions for DIP financing (.2); review MWE team correspondence re financing schedules (.1).
B230	06/12/24	S. Scaletta	2.40	Continue to draft Credit Agreement Schedules (1.6); draft Security Agreement Schedules (.8).
B230	06/12/24	A. Requejado	4.40	Correspondence with CT Corporation re status of estimate (.2); correspondence with MWE team re same (.2); continue review of corporate documents and update chart re DIP (4.0).
B230	06/12/24	J. Jumbeck	4.40	Revise draft DIP security agreement schedules (1.3); revise DIP credit agreement schedules (1.6); conference with MWE team, GP team, PR team, and DLA team re cash management issues (.4); conference with J. Haake re same (.3); conference with R. Ahmad (Ankura) and J. Haake re same (.2); correspondence with MWE team re same (.6).
B230	06/12/24	D. Simon	1.60	Review and revise DIP transaction protocol (1.4); conference with L. Halperin re same (.2).
B230	06/13/24	S. Scaletta	3.80	Continue to draft Credit Agreement and Security Agreement Schedules (.5); draft Omnibus Secretary's Certificate (2.0); review good standings and charters (.3); review operating agreements (.7); correspondence with opposing counsel on ancillary deliverables (.3).
B230	06/13/24	J. Hunt	0.40	Review S. Scaletta draft secretary's certificate (.3); correspond with S. Scaletta and J. Jumbeck re DIP financing schedules (.1).
B230	06/13/24	J. Greathouse	1.60	Review draft LaVie DIP Agreement (1.0); review and analyze Section 8.2 representations and disclosure schedules (.6).
B230	06/13/24	A. Requejado	0.40	Correspondence with S. Scaletta re ordering DIP related documents (.2); correspondence with CT Corporation re same (.2).



LaVie Care Centers, LLC

Client: 120098  
Invoice: 3919213  
Invoice Date: 08/27/24

Task	Date	Name	Hours	Description
B230	06/13/24	E. Keil	0.20	Correspondence with J. Jumbeck re good standings (.2).
B230	06/13/24	J. Jumbeck	3.80	Revise draft DIP security agreement schedules (.8); revise DIP credit agreement schedules (2.2); revise officer's certificate draft (.5); correspondence with MWE team re same (.3).
B230	06/13/24	D. Simon	1.70	Multiple correspondence and conferences with DIP lenders re DIP credit agreement issues (.4); review and revise transaction protocol re DIP (.5); conference with M. Krakovsky re same (.2); multiple conferences with J. Muenker re same (.6).
B230	06/14/24	N. Alarif	0.60	Review and analyze DIP Credit and Guaranty Agreement (.6).
B230	06/14/24	J. Greathouse	2.40	Review and revise draft LaVie DIP Agreement (1.2); correspond with N. Alarif re fraud and abuse representations (.6); correspond with G. Dimick re licensing and permits (.6).
B230	06/14/24	S. Scaletta	0.10	Review and analyze good standings and charters (.1).
B230	06/14/24	A. Requejado	0.50	Correspondence with S. Scaletta and CT Corporation re additional entity request (.5).
B230	06/14/24	L. Foody	0.20	Import DIP related diligence documents (.2).
B230	06/14/24	J. Jumbeck	2.70	Revise draft DIP security agreement schedules (1.3); revise DIP credit agreement schedules (1.4).
B230	06/14/24	G. Dimick	1.00	Conference with J. Greathouse re health regulatory review of agreement documents (.1); review and revise health regulatory schedules in DIPA (.9).
B230	06/15/24	J. Hunt	4.20	Review revised lender draft of DIP credit agreement and draft issues list in connection with same (4.2).
B230	06/15/24	J. Jumbeck	1.80	Review GP comments to DIP credit agreement (1.6); conference with J. Greathouse re healthcare disclosures (.2).
B230	06/15/24	D. Simon	0.30	Review draft issues list for Credit Agreement (.3).
B230	06/16/24	J. Hunt	2.60	Review comments from J. Jumbeck to DIP credit agreement and issues list (1.0); update draft of DIP credit agreement (1.6).
B230	06/16/24	D. Simon	0.40	Review and correspond re credit agreement issues (.4).
B230	06/17/24	E. Keil	0.50	Correspondence with J. Haake, J. Brilliant re account closings/openings (.3); revise notice





LaVie Care Centers, LLC

Client: 120098  
Invoice: 3919213  
Invoice Date: 08/27/24

Task	Date	Name	Hours	Description
				language re same (.2).
B230	06/17/24	S. Scaletta	1.00	Attention to compiling and collating signature pages (1.0).
B230	06/17/24	G. Dimick	1.70	Draft questions required to confirm information on health regulatory schedule of DIP Credit and Guaranty Agreement (1.7).
B230	06/17/24	J. Jumbeck	4.00	Review issues grid re DIP credit agreement (.8); review GP comments to DIP credit agreement (1.2); revise DIP credit agreement (2.0).
B230	06/17/24	A. Requejado	0.50	Review additional certified documents (.5).
B230	06/18/24	S. Scaletta	0.70	Prepare signature pages (.3); review charters and good standings (.4).
B230	06/18/24	J. Hunt	1.70	Update DIP credit agreement draft (1.7).
B230	06/18/24	J. Jumbeck	4.00	Review issues grid re DIP credit agreement (.8); review GP comments to same (1.2); revise same (2.0).
B230	06/18/24	A. Requejado	3.70	Review and index certified documents for go forward entities (3.7).
B230	06/18/24	A. Requejado	0.80	Correspondence with S. Scaletta re corporate documents (.3); correspondence with CT Corporation re same (.5).
B230	06/19/24	S. Scaletta	0.80	Continue to draft Credit Agreement and Security Agreement Schedules (.6); review and analyze good standing certificates and charters (.2).
B230	06/19/24	J. Hunt	0.30	Update DIP credit agreement (.3).
B230	06/19/24	J. Jumbeck	3.80	Review GP comments to DIP credit agreement schedules (.7); revise same (.2); review GP comments to DIP security agreement schedules (.3); revise same (.4); review GP comments to credit agreement (1.0); correspondence with GP team re DIP facility (.4); correspondence with MWE team re same (.5); review VP comments to cash management order (.2); correspondence with VP team re same (.1).
B230	06/19/24	D. Simon	1.30	Multiple conferences re Credit Agreement and related DIP documentation (.8); revise transaction protocol (.5).
B230	06/19/24	E. Keil	0.10	Conference with DOJ re DIP order (.1).
B230	06/20/24	J. Hunt	1.70	Review revised lender draft of DIP credit agreement (1.7).



LaVie Care Centers, LLC

Client: 120098  
Invoice: 3919213  
Invoice Date: 08/27/24

Task	Date	Name	Hours	Description
B230	06/20/24	S. Scaletta	0.70	Compile and collate signature pages (.2); review and analyze Credit Agreement Schedules (.5).
B230	06/20/24	A. Requejado	2.30	Request additional certified documents and review of same (1.1); compile executed documents (.7); correspondence with MWE team re final documents (.5).
B230	06/20/24	J. Jumbeck	4.20	Review GP draft of final DIP order (1.0); revise same (.6); review GP comments to DIP credit agreement (1.2); conference with D. Simon re same (.3); draft issues list re same (.3); correspondence with GP team re same (.3); review revised draft of DIP credit agreement (.5).
B230	06/20/24	D. Simon	1.50	Multiple communications re DIP Credit Agreement and related DIP issues (.8); review and revise same (.7).
B230	06/21/24	R. Trickey	2.70	Research and analyze DIP issues related to [REDACTED] (2.4); correspond with D. Simon re same (.3).
B230	06/21/24	S. Scaletta	2.50	Review and analyze Credit Agreement Schedules (.6); multiple conferences re DIP CA (.4); review and revise closing deliverables (1.5).
B230	06/21/24	J. Jumbeck	8.20	Conference with GP team, DLA team, FBFK team, and D. Simon re credit agreement issues list (1.4); conference with J. Hunt and S. Scaletta re same (.4); conference with R. Walker (GP team) re tax affidavit (.1); conference with GP team, DLA team, FBFK team, Troutman team, Ankura team, and MWE team re final DIP order (.9); finalize DIP credit agreement (2.3); conference with GP team and J. Greathouse re same (.4); coordinate finalization and execution of DIP credit facility documents (2.7).
B230	06/21/24	J. Hunt	3.40	Review DIP lender draft promissory note (.5); conference with MWE team re DIP credit agreement (.3); conference re health care reps in DIP credit agreement (.5); update draft DIP credit agreement (1.6); review executed DIP loan documents circulated by DIP lender counsel (.5).
B230	06/21/24	E. Keil	1.00	Conference with F. Lawall, B. Jones, et al. re DIP (1.0).
B230	06/21/24	D. Simon	4.80	Conference with DIP lenders re DIP Credit



LaVie Care Centers, LLC

Client: 120098  
Invoice: 3919213  
Invoice Date: 08/27/24

Task	Date	Name	Hours	Description
				Agreement (1.0); multiple conferences re same (.4); conference with Committee re DIP issues (1.0); multiple conferences with Ankura and others re DIP issues and hearing preparation (1.6); conference with MWE team re bidding procedure modifications (.3); multiple conferences with Stout and Ankura re same process (.5).
B230	06/23/24	J. Jumbeck	2.70	Conference with Troutman team and MWE team re DIP facility (2.7).
B230	06/23/24	D. Simon	1.30	Conference with Committee re DIP issues (1.0); communications with DIP lenders re further modifications (.3).
B230	06/24/24	S. Scaletta	0.30	Review and analyze post-closing and administrative matters (.3).
B230	06/24/24	A. Requejado	0.50	Review vendor invoices, review charges and approve for payment (.5).
B230	06/24/24	J. Jumbeck	6.00	Review Committee objection to proposed DIP facility (1.2); draft reply brief re same (2.2); research re standards for approval of DIP facility (.7); research re precedent final DIP orders (.8); correspondence with MWE team re same (.4); correspondence with DIP lender counsel re same (.2); conference with DIP lender counsel re proposal to Committee (.5).
B230	06/24/24	E. Keil	0.50	Correspondence with J. Jumbeck, D. Simon re Lument (.3); draft notice of final DIP order (.2).
B230	06/24/24	D. Northrop	0.10	Review UCC objection to entry of final order authorizing Debtors to obtain post-petition financing and to use cash collateral, and correspondence with MWE team re same (.1).
B230	06/24/24	D. Simon	3.50	Negotiations re DIP related issues (2.0); multiple conferences with team re response (.7); address informal DIP objections (.8).
B230	06/25/24	R. Trickey	1.50	Conference and correspond with MWE team re DIP research question (.3); research and analyze matters re DIP structure (1.2).
B230	06/25/24	J. Jumbeck	5.10	Continue to draft reply to Committee's objection to DIP facility final approval (1.7); revise same (.8); conference with E. Keil and J. Haake re omnibus reply to objections (.5); review D. Simon comments



LaVie Care Centers, LLC

Client: 120098  
Invoice: 3919213  
Invoice Date: 08/27/24

Task	Date	Name	Hours	Description
				re same (.3); revise same (.6); research re precedent re final DIP orders in the eleventh circuit (.8); review Lument proposed language to final DIP order (.2); correspondence with Lument counsel re same (.2).
B230	06/26/24	J. Jumbeck	3.50	Conference with Vorys team and MWE team re proposed DIP language (.5); revise draft of final DIP order (1.3); conference with L. Aiken (FBFK team) and R. Lemons (GP team) re same (.2); conference with L. Aiken (FBFK team), R. Lemons (GP team), J. Muenker, and Vorys team re proposed DIP order language (.3); revise same (.1); correspondence with Vorys team re same (.3); correspondence with DIP lenders' counsel re same (.4); prepare final DIP order for filing (.4).
B230	06/26/24	L. Foody	0.10	Correspondence with J. Jumbeck re final DIP order (.1).
B230	06/27/24	J. Jumbeck	2.00	Draft settlement terms re final DIP order (.8); revise final DIP order re same (.6); correspondence with GP team, FBFK team, DLA team, VP team, and PR team re same (.3); correspondence with Troutman team re same (.3).
B230	06/27/24	E. Keil	0.60	Revise final DIP order (.4); correspondence with D. Northrop re filing of same (.2).
B230	06/27/24	D. Northrop	0.70	Review proposed final DIP order (.2); communications with E. Keil re revisions to proposed final DIP order (.1); reformat proposed final DIP order for upload via the ECF order upload function (.3); upload proposed final DIP order via the order upload function in ECF (.1).
B230	06/28/24	S. Scaletta	0.10	Review and analyze post-closing items (.1).
B230	06/28/24	J. Jumbeck	1.50	Revise final DIP order (.4); correspondence with Troutman team re same (.3); correspondence with DIP lender counsel team re same (.3); coordinate filing and entry re same (.5).
B230	06/28/24	D. Northrop	0.50	Review revised proposed final DIP order (.1); reformat revised proposed final DIP order for upload via the order upload function in ECF (.2); upload revised proposed DIP order (.1); review final DIP order as entered by the Court on 6.28.24 and



LaVie Care Centers, LLC

Client: 120098  
Invoice: 3919213  
Invoice Date: 08/27/24

Task	Date	Name	Hours	Description
B240	06/02/24	L. Foody	1.40	correspondence with MWE team re same (.1). Review and revise tax motion (.4); prepare tax motion for filing (.2); draft taxes motion first-day hearing outline (.6); multiple correspondence with J. Haake re tax diligence (.2).
B240	06/02/24	E. Keil	0.30	Revise tax motion and finalize for filing (.2); correspondence with D. Northrop re same (.1).
B240	06/02/24	D. Simon	1.30	Review and revise tax motion (1.3).
B240	06/02/24	D. Northrop	0.30	File Debtors' emergency motion for interim and final orders authorizing Debtors to pay certain prepetition taxes, fees, related obligations on the ECF case docket (.3).
B240	06/03/24	L. Foody	0.40	Revise tax interim and final orders (.4).
B240	06/04/24	L. Foody	0.20	Revise tax interim order (.2).
B240	06/04/24	E. Keil	0.30	Revise interim taxes order (.2); correspondence with D. Northrop re uploading same (.1).
B240	06/05/24	D. Northrop	0.10	Review interim order, entered 6.5.24 authorizing Debtors to pay certain prepetition taxes, fees, related obligations, and correspondence with MWE team re same (.1).
B240	06/13/24	D. Simon	0.30	Conference with G. Hayes re provider taxes (.3).
B240	06/19/24	L. Foody	0.30	Revise tax final order in preparation for hearing (.3).
B270	06/02/24	C. Lee	1.60	Draft talking points re utilities motion (.5); review and revise utilities motion (1.1).
B270	06/02/24	D. Simon	1.20	Review and revise utilities motion (1.2).
B270	06/03/24	E. Keil	0.30	Review and finalize utilities motion for filing (.2); correspondence with D. Northrop re same (.1).
B270	06/03/24	D. Northrop	0.20	File Debtors' emergency motion for interim and final orders (i) approving Debtors' proposed form of adequate assurance of payment, (ii) establishing procedures for resolving objections by utility providers, and (iii) prohibiting utility providers from altering, refusing, or discontinuing service on the ECF case docket (.2).
B270	06/03/24	J. Haake	0.80	Review and revise utilities motion and orders (.8).
B270	06/04/24	E. Keil	0.30	Revise interim utilities order (.2); correspondence with J. Haake re same (.1).
B270	06/05/24	D. Northrop	0.10	Review interim order, entered 6.5.24 (i) approving Debtors' proposed form of adequate assurance of payment, (ii) establishing procedures for resolving



LaVie Care Centers, LLC

Client: 120098  
Invoice: 3919213  
Invoice Date: 08/27/24

Task	Date	Name	Hours	Description
				objections by utility providers, (iii) prohibiting utility providers from altering, refusing, or discontinuing service, and correspondence with MWE team re same (.1).
B270	06/07/24	J. Haake	0.60	Prepare for and participate in conference with A. Edson re utility motion (.6).
B270	06/10/24	J. Haake	0.30	Correspondence with A. Edson re final utility motion (.3).
B270	06/14/24	J. Haake	2.20	Multiple conferences and correspondence with J. Brilliant, G. Hayes, and J. Pyron re utility issues (1.2); revise draft utility order and correspondence with E. Keil and A. Edson re same (.7); correspondence with G. Hayes re utility information (.3).
B270	06/17/24	E. Keil	0.60	Review utilities objection (.4); correspondence with J. Haake, A. Dalsass, et al. re same (.2).
B270	06/17/24	J. Haake	2.00	Conferences and correspondence with counsel for Duke Energy re adequate assurance demand (.8); conference with R. Johnson III re utilities and adequate assurance demand (.5); conferences with A. Dalsas re utility issues (.3); correspondence and conference with J. Pyron re utility demands (.4).
B270	06/18/24	J. Haake	1.90	Correspondence with J. Pyron re utilities (.3); correspondence with M. Caskey re utilities agreement (.5); correspondence with J. Russell re utility adequate assurance and analysis of proposed adequate assurance (.8); correspondence with K. Bartlett re adequate assurance request for Lumen (.3).
B270	06/19/24	J. Haake	0.90	Correspondence with J. Pyron re utility adequate assurance demands (.6); correspondence with D. Simon re utility adequate assurance (.3).
B270	06/19/24	C. Lee	0.30	Correspond with E. Keil, MWE team re utilities order (.1); review and revise same (.2).
B270	06/20/24	J. Haake	1.40	Prepare for conference with representative of Lumen re utility adequate assurance request (.8); conference with A. Dalsas re utility issues (.6).
B270	06/25/24	J. Haake	0.60	Conference with Blue Ridge re utility services (.6).
B280	06/02/24	R. Trickey	0.40	Finalize resident care vendors motions (.4).
B280	06/03/24	R. Trickey	0.20	Revise interim and final orders for resident care





LaVie Care Centers, LLC

Client: 120098  
Invoice: 3919213  
Invoice Date: 08/27/24

Task	Date	Name	Hours	Description
				vendors motion and consolidated creditors matrix motion (.2).
B280	06/04/24	E. Keil	0.40	Revise resident vendor order (.3); correspondence with D. Northrop re uploading same (.1).
B280	06/04/24	R. Trickey	0.30	Revise resident care vendor order to conform to comments by the court and US Trustee (.3).
B280	06/05/24	R. Trickey	1.30	Draft letter for Company use in vendor inquiries re automatic stay (1.0); correspond with E. Keil re same (.3).
B280	06/05/24	L. Foody	0.50	Research re vendor communication letters (.5).
B280	06/05/24	E. Keil	0.80	Conferences with D. Simon, et al. re vendor issues (.6); correspondence with R. Trickey re letter re same (.2).
B280	06/05/24	D. Northrop	0.10	Review interim order, entered 6.5.24 authorizing payment of prepetition obligations owed to resident care vendors, and correspondence with MWE team re same (.1).
B280	06/06/24	J. Haake	1.00	Conference with B. Jones re vendor issues (.1); revise bid procedures (.5); conference with R. Ahmed re vendor issues (.4).
B280	06/06/24	E. Keil	2.10	Revise vendor continued services letter (.5); conference with Debtors, B. Jones, D. Simon, et al. re vendor issues (1.3); correspondence with Debtors re same (.3).
B280	06/06/24	D. Simon	1.60	Multiple conferences with client re vendor and operational issues (1.1); review and analyze same (.5).
B280	06/07/24	J. Haake	0.60	Multiple conferences with R. Ahmed re vendor issues (.6).
B280	06/11/24	J. Haake	1.00	Prepare for and participate in conference with R. Ahmed, R. Jurbala, S. Brazill, and A. Lojek re vendor issues (1.0).
B280	06/11/24	E. Keil	0.30	Correspondence with Company re vendor issues (.3).
B280	06/17/24	R. Trickey	0.20	Revise resident care vendors final order (.2).
B280	06/18/24	J. Haake	1.30	Correspondence with A. Lojek and conference with R. Jurbala re vendor issues (1.3).
B280	06/20/24	J. Haake	0.90	Correspondence with D. Simon, S. Brazill, and R. Jurbala re CFS fuel card program (.4); correspondence with representatives of CFS re fuel



LaVie Care Centers, LLC

Client: 120098  
Invoice: 3919213  
Invoice Date: 08/27/24

Task	Date	Name	Hours	Description
				card program (.5).
B280	06/21/24	E. Keil	1.30	Conference with M. Wallace re CMS regulatory concerns (.5); conference with J. Watson, B. Jones re same (.8).
B280	06/25/24	J. Haake	1.30	Conference with CFS re vendor issues (.7); research vendor issues and conference with A. Dalsas re same (.6).
B280	06/28/24	J. Haake	0.50	Conference re vendor issue with L. Wolgast (.5).
B290	06/02/24	E. Keil	0.50	Revise insurance motion and finalize for filing (.3); correspondence with D. Simon re same (.1); correspondence with D. Northrop re same (.1).
B290	06/02/24	D. Northrop	0.30	File Debtors' emergency motion for interim and final orders authorizing Debtors to (i) maintain existing insurance policies and surety bonds, and pay obligations arising thereunder, (ii) renew, revise, extend, supplement, change, or enter into new insurance policies and surety bonds, and (iii) granting related relief (.3).
B290	06/02/24	C. Lee	1.70	Draft talking points re insurance motion (.5); review and revise insurance motion (1.2).
B290	06/02/24	D. Simon	1.00	Review and revise insurance motion (1.0).
B290	06/03/24	C. Lee	0.50	Review and revise talking points re insurance motion (.1); review and revise proposed interim orders re first-day relief re insurance motion (.4).
B290	06/03/24	J. Haake	0.40	Review and revise insurance motion and orders (.4).
B290	06/04/24	E. Keil	0.30	Revise interim insurance order (.2); correspondence with D. Northrop re same (.1).
B290	06/05/24	D. Northrop	0.10	Review interim order, entered 6.5.24 authorizing Debtors to maintain existing insurance policies, surety bonds, pay obligations arising thereunder, granting related relief, and correspondence with MWE team re same (.1).
B290	06/07/24	J. Haake	0.30	Correspondence with G. Hayes re surety bond information (.3).
B290	06/11/24	J. Haake	3.30	Draft conflict protocols and correspondence with D. Simon re same (2.3); analysis of Medicare and insurance issues, and correspondence with E. Keil and D. Simon re same (1.0).
B290	06/11/24	R. Smethurst	0.50	Review RRG PL insurance policy (.2); multiple conferences and correspondence with M. Helt re





LaVie Care Centers, LLC

Client: 120098  
Invoice: 3919213  
Invoice Date: 08/27/24

Task	Date	Name	Hours	Description
B290	06/12/24	R. Smethurst	1.30	insurance treatment post petition (.3). Review and evaluate PL insurance policy, and multiple correspondence with M. Helt and A. Smith re same (.8); meeting with A. Smith re Georgia case law research re PL insurance treatment in bankruptcy (.5).
B290	06/12/24	A. Smith	0.40	Research [REDACTED] (4).
B290	06/13/24	R. Smethurst	0.50	Review GA stipulated judgment insurance research (.3); correspondence with M. Helt and A. Smith re potential CH 11 ramifications of same (.2).
B290	06/13/24	A. Smith	4.60	Research and summarize effects on liability insurance coverage of stipulated judgment under Georgia law (4.6).
B290	06/17/24	E. Keil	0.30	Correspondence with C. Lee, J. Haake re insurance requests (.3).
B290	06/17/24	C. Lee	3.00	Conference with counsel to Chubb re comments to final insurance, wages order (.2); review and analyze same (.4); review and analyze policies re same (.4); correspond with E. Keil, MWE team re same (.4); correspond with counsel to Chubb re same (.2); conference with J. Haake re same (.2); conference with J. Haake re workers compensation, comments to final wages order (.2); review and revise same (.3); correspond with E. Keil, MWE team re same (.2); conference with R. Trickey re workers compensation regulations, research re same (.2); review and analyze workers compensation policies (.3).
B290	06/18/24	J. Haake	2.90	Prepare for and participate in conference with E. Hyder re workers compensation issue and comments to insurance order (1.7); multiple conferences with C. Lee re comments and revised orders (1.2).
B290	06/18/24	E. Keil	0.30	Correspondence with United Specialty re request (.2); correspondence with G. Hayes re same (.1).
B290	06/18/24	C. Lee	1.60	Conference with J. Haake, Chubb re comments to first-day insurance order (.9); conferences with J. Haake re same (.7).
B290	06/19/24	J. Haake	1.70	Conference with E. Hyder and W. Simkulak re insurance second-day orders language (1.2);



LaVie Care Centers, LLC

Client: 120098  
Invoice: 3919213  
Invoice Date: 08/27/24

Task	Date	Name	Hours	Description
B290	06/19/24	C. Lee	1.20	correspondence and conferences with C. Lee re insurance issues (.5). Review and revise insurance order (.4); video conference with Chubb counsel re comments to same (.5); conference with J. Haake re same (.2); correspond with J. Haake, MWE team, Company re same (.1).
B290	06/20/24	J. Haake	1.90	Conference with J. Horowitz re insurance issues (.5); conference with T. Brink re insurance order (.4); prepare for and participate in conference with E. Hyder re comments from Chubb re insurance (.8); correspondence with E. Hyder re insurance issues (.2).
B290	06/20/24	C. Lee	2.00	Correspond with Chubb counsel re comments to insurance order (.5); review and analyze insurance policies re same (.4); correspond with J. Haake, MWE team, Company re same (.5); review and revise insurance, wages orders re Chubb comments (.4); correspond with J. Haake, MWE team re same (.2).
B290	06/20/24	E. Keil	0.60	Conference with J. Haake re Chubb insurance issue (.4); correspondence with J. Haake re same (.2).
B290	06/21/24	C. Lee	1.20	Multiple conferences with Chubb counsel re comments to insurance motion (.5); correspond with E. Keil, MWE team re same (.2); conferences with J. Haake re same (.3); correspond with Chubb counsel re same (.2).
B290	06/24/24	C. Lee	0.20	Conference with Chubb counsel re comments to insurance order (.1); correspond with E. Keil, MWE team re same (.1).
B290	06/26/24	C. Lee	0.20	Conference with Chubb counsel re insurance order (.2).
B310	06/08/24	R. Trickey	0.40	Research issues re bar date motions in N.D. Georgia (.4).
B310	06/08/24	E. Keil	0.30	Correspondence with KCC team, R. Trickey re bar date motion (.3).
B310	06/12/24	E. Keil	1.00	Conferences with A. Dalsass, Company re resident service (.8); conference with D. Simon re same (.2).
B310	06/16/24	E. Keil	1.50	Draft bar date motion and accompanying notice (1.5).



LaVie Care Centers, LLC

Client: 120098  
Invoice: 3919213  
Invoice Date: 08/27/24

Task	Date	Name	Hours	Description
B310	06/17/24	E. Keil	1.30	Revise bar date motion and POC form (1.1); correspondence with S. Reitzel re same (.2).
B310	06/27/24	E. Keil	1.70	Conference with D. Simon re bar date motion (.2); revise same (1.5).
B310	06/28/24	E. Keil	2.30	Revise bar date motion (1.4); conference and correspondence with S. Reitzel re same (.4); correspondence with A. Marchant-Lessa re same (.3); revise same (.2).
B310	06/28/24	D. Simon	0.60	Review and revise bar date motion (.4); conference with J. Muenker re same (.2).
B310	06/30/24	C. Lee	0.10	Review and revise bar date motion (.1).
B320	06/07/24	J. Haake	1.40	Prepare for and attend conference re plan and DS (.6); analysis of plan classes (.8).
B320	06/07/24	D. Simon	0.90	Conference with M. Helt and J. Haake re plan strategy (.5); conference with J. Haake re plan sponsor protocol (.4).
B320	06/07/24	M. Helt	2.20	Draft executive summary/plan-structuring issues (2.2).
B320	06/11/24	J. Haake	1.20	Begin draft of executive summary of plan (1.2).
B320	06/12/24	J. Haake	3.80	Revise draft plan (3.8).
B320	06/13/24	R. Trickey	0.50	Conference with E. Keil, J. Haake, L. Foody to discuss plan and disclosure statement strategy (.5).
B320	06/13/24	J. Haake	4.30	Conference with E. Keil re plan strategy (.4); revise draft plan to incorporate comments (3.9).
B320	06/13/24	E. Keil	1.30	Conference with D. Simon, J. Haake re plan/disclosure statement (.5); conference with L. Foody, J. Haake, et al. re same (.5); revise plan (.3).
B320	06/13/24	L. Foody	1.00	Participate in conference with J. Haake re disclosure statement (.1); review disclosure statement in preparation for conference (.4); participate in conference with J. Haake, E. Keil, and R. Trickey re disclosure statement (.5).
B320	06/13/24	D. Simon	0.50	Conference with J. Haake and E. Keil re plan discussion (.5).
B320	06/14/24	J. Haake	4.00	Revise draft plan and correspondence with L. Foody, R. Trickey, and E. Keil re same (4.0).
B320	06/14/24	E. Keil	0.90	Conference with S. Reitzel, J. Westwood re solicitation (.2); conference with J. Haake re same (.7).
B320	06/14/24	L. Foody	0.10	Conference with J. Haake re disclosure statement



LaVie Care Centers, LLC

Client: 120098  
Invoice: 3919213  
Invoice Date: 08/27/24

Task	Date	Name	Hours	Description
				(.1).
B320	06/16/24	J. Haake	1.00	Revise draft plan and disclosure statement (1.0).
B320	06/17/24	R. Trickey	2.30	Draft solicitation procedures motion (2.3).
B320	06/17/24	L. Foody	1.50	Draft disclosure statement background section (1.5).
B320	06/18/24	R. Trickey	2.30	Continue to draft solicitation motion (2.3).
B320	06/18/24	L. Foody	1.00	Continue drafting disclosure statement (1.0).
B320	06/19/24	L. Foody	3.50	Continue drafting disclosure statement background section (3.5).
B320	06/20/24	R. Trickey	3.60	Review and revise plan and disclosure statement re solicitation procedures (2.1); revise solicitation procedures motion (1.2); correspond with J. Haake and Verita team re same (.3).
B320	06/20/24	J. Haake	3.70	Correspondence with R. Trickey re solicitation motion (.4); revise combined plan and disclosure statement (3.3).
B320	06/20/24	L. Foody	3.00	Continue drafting disclosure statement background (3.0).
B320	06/21/24	R. Trickey	5.60	Revise solicitation motion (.7); correspond and conference with J. Haake re same (.5); draft exhibits to solicitation motion (4.4).
B320	06/21/24	J. Haake	6.10	Revise draft combined plan and disclosure statement (5.6); multiple conferences with L. Foody and R. Trickey re same (.5).
B320	06/21/24	L. Foody	2.10	Continue drafting disclosure statement background section (2.1).
B320	06/23/24	J. Haake	1.40	Revise draft combined plan and disclosure statement (1.1); correspondence with L. Foody re same (.3).
B320	06/24/24	R. Trickey	2.10	Correspond and conference with J. Haake re revisions to solicitation procedures motion and ballots (.3); revise solicitation procedures and related documents (1.7); correspond with KCC team re balloting considerations (.1).
B320	06/24/24	L. Foody	6.00	Revise disclosure statement background section (6.0).
B320	06/25/24	J. Haake	1.00	Revise draft combined plan and disclosure statement (1.0).
B320	06/25/24	L. Foody	2.40	Research re [REDACTED] (1.4); update background section (1.0).
B320	06/26/24	L. Foody	7.50	Revise combined plan and disclosure statement (7.5).



LaVie Care Centers, LLC

Client: 120098  
Invoice: 3919213  
Invoice Date: 08/27/24

Task	Date	Name	Hours	Description
B320	06/28/24	J. Haake	2.80	Revise draft plan (2.4); conference with D. Simon and J. Jumbeck re same (.4).
B320	06/28/24	J. Jumbeck	2.60	Conference with J. Haake and D. Simon re draft plan structure (.5); review current draft of combined plan and disclosure statement (2.1).
B320	06/28/24	D. Simon	1.00	Multiple conferences with J. Jumbeck and J. Haake re plan issues (1.0).
B320	06/29/24	R. Trickey	0.90	Correspond with E. Keil, J. Haake, J. Jumbeck re Verita feedback on solicitation procedures (.4); revise solicitation procedures in accordance with same (.5).
B320	06/29/24	E. Keil	0.30	Correspondence with R. Trickey re solicitation procedures (.3).
B410	06/26/24	J. Haake	3.50	Research CMS issues (1.9); analysis of OTAs and conference with D. Simon re same (1.2); conference with G. Fosheim re CMS issues (.4).
B430	06/03/24	J. Haims	3.00	Correspondence re investigation and strategy (.5); review and revise draft interview memo (1.0); review first-day filings (.5); review documents relevant to investigation (1.0).
B430	06/03/24	C. Zhu	0.80	Revise memo re investigation background information (.8).
B430	06/03/24	H. Udow	1.10	Review and analyze documents re investigation (1.1).
B430	06/03/24	L. Barrett	0.30	Review and analyze documents re investigation background materials (.3).
B430	06/04/24	J. Haims	1.50	Draft findings re investigation and correspondence re bankruptcy filing, investigation, document collection and review, interview preparations, and strategy (1.5).
B430	06/04/24	C. Zhu	2.20	Review first-day declaration (.8); participate in next step meeting with MWE and Chapman Cutler teams (.5); draft preliminary search terms re investigation (.9).
B430	06/04/24	H. Udow	1.90	Conference with MWE and Chapman Cutler teams re next steps (.5); draft search terms for document review (.8); assist with interview memo for C. Bryson and G. Hayes (.6).
B430	06/04/24	L. Barrett	0.60	Review and analyze background materials re investigation (.6).





LaVie Care Centers, LLC

Client: 120098  
Invoice: 3919213  
Invoice Date: 08/27/24

Task	Date	Name	Hours	Description
B430	06/05/24	C. Zhu	0.30	Participate in team meeting regarding search terms re investigation (.2); review updated search terms (.1).
B430	06/05/24	J. Haims	4.00	Correspondence re investigation, interview preparations, and strategy (2.0); prepare for next interview (2.0).
B430	06/05/24	H. Udow	3.70	Conference with MWE team re [REDACTED] (1.1); conference with J. Haims and Chapman Cutler re [REDACTED] (.5); draft interview outline for D. Dias (1.7).
B430	06/05/24	L. Barrett	0.20	Conference with C. Zhu re search terms (.2).
B430	06/06/24	J. Haims	4.00	Correspondence re investigation, interview preparations, and strategy (1.0); continue to prepare for next interview (3.0).
B430	06/07/24	J. Haims	5.00	Correspondence re investigation, interview preparations, and strategy (2.0); continue to prepare for next interview (3.0).
B430	06/07/24	D. Valentino	2.00	Process data and promote documents for attorney review (1.1); resolve technical issues (.2); conduct final QC (.2); update search index (.2); update search term reports (.3).
B430	06/07/24	H. Udow	1.20	Revise D. Dias interview outline (.7); conference with J. Haims and Chapman Cutler re next steps (.5).
B430	06/08/24	J. Haims	1.00	Prepare for D. Dias interview and correspondence re same, investigation, and strategy (1.0).
B430	06/09/24	J. Haims	2.00	Continue to prepare for D. Dias interview and correspondence re same, investigation, and strategy (2.0).
B430	06/10/24	B. Casten	1.20	Generate custom search term reports and saved searches in the document repository as requested by the case team (.5); coordinate the processing and loading of additional client custodial email into the document repository for review and production (.7).
B430	06/10/24	J. Haims	8.00	Continue to prepare for and attend D. Dias interview and correspondence re same (5.0); correspondence re investigation, document collection and review, and strategy (2.0); legal research re same (1.0).
B430	06/10/24	D. Butkovich	0.30	Conference with H. Udow, C. Zhu re document review strategy (.3).
B430	06/10/24	H. Udow	7.10	Interview D. Dias (3.0); conference with D.



LaVie Care Centers, LLC

Client: 120098  
Invoice: 3919213  
Invoice Date: 08/27/24

Task	Date	Name	Hours	Description
				Butkovich and C. Zhu re document review plan (.3); draft interview memo of C. Bryson and G. Hayes (3.8).
B430	06/11/24	J. Haims	7.00	Prepare for and attend conference with B. Jones and J. Decker (2.0); correspondence re investigation, document collection and review, and strategy (2.0); continue legal research re same (1.5); review relevant company documents (1.5).
B430	06/11/24	C. Zhu	0.70	Participate in MWE meeting re next steps (.5); review operating agreements (.2).
B430	06/11/24	F. Belayneh	1.50	Integrate data selected for review into review platform (.6); build incremental dtSearch index and run search term report (.6); conduct QC on data processed to ensure file count is correct and all natives and texts are present (.3).
B430	06/11/24	E. Kwon	0.50	Identify potentially relevant documents for case development review (.5).
B430	06/11/24	H. Udow	2.40	Conference with MWE team re next steps (.6); revise interview memo re C. Bryson and G. Hayes interview (.8); conference with J. Haims and Chapman Cutler re legal research items (.3); draft D. Dias interview memo (.7).
B430	06/11/24	L. Barrett	1.20	Conference with MWE litigation team re investigation next steps (.5); review and analyze documents re investigation (.4); research re [REDACTED] (.3).
B430	06/12/24	H. Udow	4.80	Continue to draft D. Dias interview memo (3.6); conference with C. Zhu re document review (.5); review sample of emails (.7).
B430	06/13/24	J. Haims	1.00	Correspondence with C. Zhu re investigation, additional interviews, document collection and review, and strategy (1.0).
B430	06/13/24	C. Zhu	5.80	Review and analyze documents collected and related materials (4.9); review first-day declaration and background documents (.9).
B430	06/13/24	D. Butkovich	0.50	Create sample set of post-cull search result universe for associate review (.2); create post-cull review set search for Continuous Active Learning model training (.3).
B430	06/13/24	H. Udow	3.10	Conference with C. Zhu re additional search terms



LaVie Care Centers, LLC

Client: 120098  
Invoice: 3919213  
Invoice Date: 08/27/24

Task	Date	Name	Hours	Description
				and initial document review (1.8); analyze background information about Board members and affiliated entities (1.3).
B430	06/14/24	J. Haims	6.00	Correspondence re investigation, additional interviews, document collection and review, and strategy (3.0); review and revise draft of D. Dias interview memo (1.5); review documents relevant to the investigation to prepare for additional interviews (1.5).
B430	06/14/24	C. Zhu	1.20	Review background materials (.8); coordinate with discovery team re additional search terms (.4).
B430	06/14/24	L. Barrett	0.20	Review correspondence re document review (.2).
B430	06/15/24	J. Haims	1.50	Correspondence re investigation, additional interviews, document collection and review, and strategy (.2); review revised draft of D. Dias interview memo and correspondence re same (.3); prepare for additional interview of C. Bryson and G. Hayes (1.0).
B430	06/16/24	J. Haims	1.50	Correspondence re investigation, additional interviews, document collection and review, and strategy (.5); continue to prepare for additional interview of C. Bryson and G. Hayes (1.0).
B430	06/17/24	B. Casten	1.50	Identify the post-culling and threading review set in the document repository (.5); build a new analytics index and project in the document repository for scoring documents for responsiveness (.7); correspondence with the review team re TAR training work flows and predicted volumes (.3).
B430	06/17/24	C. Zhu	1.50	Review documents relating to [REDACTED] (1.2); review entity and personal reports on certain individuals (.3).
B430	06/17/24	J. Haims	6.00	Correspondence re investigation, additional interviews, document collection and review, privilege issues, and strategy (3.0); continue to prepare for and attend additional interview of C. Bryson and G. Hayes (3.0).
B430	06/17/24	H. Udow	1.60	Conference with C. Bryson, G. Hayes, J. Decker, D. Dias, Chapman and MWE re follow-up questions (1.6).
B430	06/17/24	J. Hoffman	1.90	Provide background on four individuals for C. Zhu





LaVie Care Centers, LLC

Client: 120098  
Invoice: 3919213  
Invoice Date: 08/27/24

Task	Date	Name	Hours	Description
				re interviews (1.9).
B430	06/17/24	L. Barrett	0.40	Research re [REDACTED] (.4).
B430	06/18/24	B. Casten	0.50	Validation of the TAR model and monitoring of initial review stages in the TAR model (.5).
B430	06/18/24	C. Zhu	1.80	Participate in meeting re next steps (.8); review relevant documents (1.0).
B430	06/18/24	J. Haims	6.00	Correspondence re investigation, additional interviews, document collection and review, privilege issues, and strategy (4.0); review relevant case documents (1.0); legal research re same (1.0).
B430	06/18/24	H. Udow	2.30	Correspondence re Ankura research (.3); conference with MWE investigation team and Chapman Cutler team re document review and associated follow up (1.3); draft interview memo re meeting with C. Bryson, G. Hayes, and D. Dias (.7).
B430	06/18/24	N. Fomba	4.20	Conference with team re next steps in investigation (1.0); review internal interview memorandums (1.5); review correspondence re document collection and TAR review (1.2); correspond with team re same (.5).
B430	06/18/24	L. Barrett	1.70	Conference with investigation team re next steps (.8); research re [REDACTED] (.9).
B430	06/19/24	J. Haims	4.00	Correspondence re investigation, additional interviews, document collection and review, privilege issues, and strategy (1.5); continue to review relevant case documents (1.5); continue legal research re same (1.0).
B430	06/20/24	C. Zhu	0.40	Attend meeting re document collection and searches (.4).
B430	06/20/24	F. Belayneh	1.00	Ingest data for processing and populate custodian information in preparation to load into the review platform (.6); conduct QC on data processed to ensure file count is correct and all text and natives are present (.4).
B430	06/20/24	J. Haims	2.00	Correspondence re investigation, additional interviews, document collection and review, privilege issues, and strategy (2.0).
B430	06/20/24	H. Udow	3.10	Conference with all MWE team re status update (.6); revise search parameters and coordinate document review preparation (1.3); review case law re



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LaVie Care Centers, LLC

Client: 120098  
Invoice: 3919213  
Invoice Date: 08/27/24

Task	Date	Name	Hours	Description
				██████████ (1.2).
B430	06/20/24	N. Fomba	2.00	Participate in LaVie cross team conference on documents sources and collection (.7); review correspondence with McDermott discovery re search terms and document review, and coordinate with Chapman re same (1.3).
B430	06/20/24	L. Barrett	0.40	Participate in conference with MWE team re document collection (.4).
B430	06/21/24	J. Haims	5.00	Correspondence re investigation, additional interviews, document collection and review, privilege issues, and strategy (3.0); continue to review relevant case documents (1.0); review and revise draft interview memorandum (1.0).
B430	06/21/24	H. Udow	3.00	Draft interview memo of C. Bryson, G. Hayes, D. Dias for Chapman (2.1); review related entities research re ██████████ (.9).
B430	06/22/24	B. Casten	0.50	Draft inventory report and cost estimate of transferred client data (.4); correspondence with the case team re same (.1).
B430	06/22/24	J. Haims	1.00	Correspondence re investigation, additional interviews, document collection and review, privilege issues, and strategy (.5); continue to review relevant case documents (.5).
B430	06/23/24	J. Haims	3.00	Correspondence re investigation, additional interviews, document collection and review, privilege issues, and strategy (2.0); continue to review relevant case documents (1.0).
B430	06/24/24	B. Casten	0.50	Generate a log of incoming client data and create an archival preservation copy of same (.5).
B430	06/24/24	J. Haims	5.00	Correspondence re investigation, additional interviews, document collection and review, privilege issues, and strategy (2.5); legal research re same (1.0); review and revise draft interview memorandum (.5); prepare for interviews in coordination with Chapman (1.0).
B430	06/24/24	H. Udow	1.10	Conference with J. Haims and Chapman Cutler re status update (.3); review note documents and Board materials (.8).
B430	06/25/24	C. Zhu	1.20	Participate in team meeting re next steps (.5); participate in conference with H. Udow and C.



LaVie Care Centers, LLC

Client: 120098  
Invoice: 3919213  
Invoice Date: 08/27/24

Task	Date	Name	Hours	Description
B430	06/25/24	J. Haims	4.00	Fomba re background and next steps (.3); review background materials for [REDACTED] (.4). Correspondence re investigation, additional interviews, document collection and review, privilege issues, and strategy (2.5); continue to review and revise draft interview memorandum, and correspondence re same (.5); continue to prepare for interviews (1.0).
B430	06/25/24	H. Udow	3.40	Revise interview memo re C. Bryson, G. Hayes, D. Dias interview (.5); conference with B. Paulsen re [REDACTED] (.5); conference with MWE team re next steps (.4); conference with C. Fomba and C. Zhu re case updates (.3); draft list of questions for Chapman (1.7).
B430	06/25/24	N. Fomba	5.00	Conference with case team re document collection (.5); conference with H. Udow and C. Zhu re case updates (.5); review of interview memo (1.0); legal research re potential claims and causes of action (3.0).
B430	06/25/24	L. Barrett	0.30	Conference with MWE litigation team re investigation (.3).
B430	06/26/24	J. Haims	3.50	Correspondence re investigation, additional interviews, document collection and review, privilege issues, and strategy (2.0); continue to prepare for interviews and correspondence re same (1.5).
B430	06/26/24	N. Fomba	5.70	Participate in weekly conference with case team re case updates (.5); review [REDACTED] (1.0); draft presentation re legal claims (3.2); research re [REDACTED] (1.0).
B430	06/26/24	D. Valentino	1.80	Process data and promote documents for attorney review (.7); resolve technical issues (.2); conduct final QC (.4); update search index (.2); update search term reports (.3).
B430	06/26/24	H. Udow	2.00	Conference with MWE team re status update (.5); conference with J. Haims re [REDACTED] (.4); revise list of interview questions for Chapman (1.1).
B430	06/26/24	L. Barrett	1.80	Research re [REDACTED] (1.6); draft



LaVie Care Centers, LLC

Client: 120098  
Invoice: 3919213  
Invoice Date: 08/27/24

Task	Date	Name	Hours	Description
				memorandum re same (.2).
B430	06/26/24	C. Zhu	1.00	Review and summarize [REDACTED] (.6); participate in discovery team meeting (.4).
B430	06/27/24	C. Zhu	2.40	Review and revise interview questions for Chapman (2.4).
B430	06/27/24	J. Haims	1.00	Correspondence re investigation, additional interviews, document collection and review, privilege issues, and strategy (1.0).
B430	06/27/24	H. Udow	2.90	Draft interview questions for Chapman re investigation (2.9).
B430	06/27/24	N. Fomba	1.00	Review and analyze interview memo re upcoming conference (1.0).
B430	06/28/24	J. Haims	3.50	Correspondence re investigation, additional interviews, document collection and review, privilege issues, and strategy (2.0); prepare for interviews and correspondence re same (1.5).
B430	06/29/24	J. Haims	1.00	Prepare for additional interviews (1.0).
B430	06/30/24	J. Haims	1.00	Correspondence re investigation, additional interviews, document collection and review, privilege issues, and strategy (.5); continue to prepare for interviews and correspondence re same (.5).
B470	06/03/24	A. Chatham	0.60	Finalize and file notice of suggestion of bankruptcy in Brandon litigation matter (.6).
B470	06/03/24	N. Bull	1.80	Multiple conferences with D. Simon re Pennsylvania and Florida litigation (.4); revise filings (.6); confer with A. Chatham, E. Keil, M. Khurana and H. Putre re same (.8).
B470	06/04/24	A. Chatham	0.30	Review and analyze pending motion to amend complaint in Brandon litigation (.3).
B470	06/04/24	B. Paulsen	0.50	Conference with Chapman Cutler and MWE teams to discuss discovery and next steps (.5).
B470	06/04/24	N. Bull	1.50	Multiple correspondence with D. Simon, J. Anthony and A. Chatham re litigation (.5); review first-day declaration re same (1.0).
B470	06/05/24	A. Chatham	0.30	Correspondence with plaintiffs' counsel in Brandon litigation (.3).
B470	06/05/24	N. Bull	3.50	Multiple conferences with J. Haims and D. Simon re developments and litigation strategy (.5); revise



**McDermott  
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LaVie Care Centers, LLC

Client: 120098  
Invoice: 3919213  
Invoice Date: 08/27/24

Task	Date	Name	Hours	Description
B470	06/06/24	A. Chatham	0.80	draft papers for motion to extend the stay (3.0). Review and analyze reply brief filed in Brandon litigation (.8).
B470	06/06/24	N. Bull	1.50	Multiple conferences and correspondence with D. Simon, A. Chatham and E. Keil re Florida litigations (1.0); review filings re same (.5).
B470	06/07/24	E. Kwon	0.80	Identify documents for review indexing project (.8).
B470	06/07/24	N. Bull	2.50	Review and analyze Florida litigation and draft communications to plaintiffs' counsel (2.0); review legal research concerning adversary proceeding (.5).
B470	06/07/24	A. Chatham	0.80	Review and revise draft correspondence to plaintiffs' counsel re violation of automatic stay and related analysis (.8).
B470	06/10/24	N. Bull	2.00	Multiple correspondence with plaintiffs' counsel re ongoing litigation (.4); review draft papers for adversary paper (1.6).
B470	06/11/24	T. Cramton	0.80	Review Board presentation and other background materials (.3); participate in MWE-Ankura conference re document management and collection (.5).
B470	06/11/24	B. Paulsen	0.50	Conference with MWE team re ongoing discovery (.5).
B470	06/11/24	N. Bull	1.50	Multiple conferences and correspondence with D. Simon, T. Cramton and E. Keil re discovery (1.0); conference and multiple correspondence with D. Simon, M. Khurana, E. Keil and C. Lee re adversary complaint and related papers (.5).
B470	06/12/24	N. Bull	0.50	Multiple correspondence with D. Simon, M. Khurana, E. Keil and C. Lee re adversary complaint and related papers (.5).
B470	06/13/24	T. Cramton	0.20	Conference with N. Bull and E. Keil re UCC data room (.1); correspondence with MWE e-discovery team re same (.1).
B470	06/13/24	N. Bull	2.00	Review first-day declaration and hearing transcript re litigation (2.0).
B470	06/14/24	T. Cramton	0.50	Multiple correspondence with N. Bull re data room/relativity site (.2); coordinate with E. Keil and MWE e-discovery team to set up relativity site (.3).
B470	06/14/24	S. Wright	0.60	Implement additional processes in data room (.6).
B470	06/14/24	N. Bull	3.50	Multiple conferences with D. Simon, J. Haims, C.



LaVie Care Centers, LLC

Client: 120098  
Invoice: 3919213  
Invoice Date: 08/27/24

Task	Date	Name	Hours	Description
				Lee, T. Cramton and E. Keil re litigation strategy and discovery (1.5); multiple conferences and correspondence with J. Anthony re Florida litigation (1.0); review memoranda and pleadings re same (1.0).
B470	06/17/24	T. Cramton	0.70	Review and respond to multiple correspondence re document collection/processing (.4); conference with E. Keil and N. Bull re same (.3).
B470	06/17/24	N. Bull	3.80	Multiple conferences and correspondence with MWE team re discovery (1.0); revise adversary papers (2.0); conference with investigation team re same (.4); conference with D. Simon re strategy (.4).
B470	06/17/24	E. Kwon	0.60	Ensure documents for review properly excluding documents (.6).
B470	06/18/24	T. Cramton	1.40	Review UCC initial document requests (.4); conference with N. Bull re additional background facts, case strategy, and considerations for document collection and discovery (1.0).
B470	06/18/24	S. Wright	0.60	Process data room documents for discovery platform (.6).
B470	06/18/24	E. Kwon	1.10	Isolate potentially relevant documents for case development indexing review (1.1).
B470	06/18/24	N. Bull	4.60	Conference with T. Cramton re discovery (1.0); conference with D. Simon re same (.4); review discovery request (.4); review letter to litigation plaintiffs and related pleadings (.8); revise adversary motion papers (2.0).
B470	06/19/24	T. Cramton	4.50	Conference with J. Haims to discuss investigation interviews, document collection, and status of document review (.5); emails to coordinate document collection and discovery workstreams between Chapter 11 litigation, bankruptcy, and investigation teams, including follow up on same (1.0); conference with MWE team, client, and Ankura re UCC document requests (1.5); review investigation interview and document collection memos (1.0); conference with N. Bull re same (.3); coordinate with MWE e-discovery team to consolidate relativity platforms (.2).
B470	06/19/24	N. Bull	2.50	Multiple conferences with MWE team and client re





LaVie Care Centers, LLC

Client: 120098  
Invoice: 3919213  
Invoice Date: 08/27/24

Task	Date	Name	Hours	Description
				discovery (2.0); review and analyze search terms (.5).
B470	06/19/24	E. Kwon	0.20	Isolate potentially relevant documents for case development indexing review (.2).
B470	06/20/24	T. Cramton	2.90	Participate in MWE cross-team conference with litigation, investigation, and bankruptcy teams re document collection and management (.5); conference re same with N. Bull (.5); review and analyze case law on potential privilege issues (.5); conference with N. Bull and H. Putre re legal research re privilege (.5); review and analyze UCC document requests, and prepare initial search terms for same (.9).
B470	06/20/24	H. Putre	4.00	Review and analyze documents for background related to privilege issue (1.2); conference with T. Cramton and N. Bull re privilege issue research (.5); research and analyze re [REDACTED] (2.3).
B470	06/20/24	E. Kwon	0.80	Coordinate preparing additional documents for case development review in the discovery document repository (.5); conference with T. Cramton regarding producing documents to UCC (.3).
B470	06/20/24	N. Bull	7.00	Multiple conferences and correspondence with MWE team and DLA re discovery and strategy (1.5); review legal research (2.0); emails with plaintiffs counsel re same (.5); revise adversary proceeding papers (2.0); review memoranda (1.0).
B470	06/20/24	B. Paulsen	0.40	Conference with team re document review (.4).
B470	06/21/24	H. Putre	3.20	Research, analyze, and draft findings re privilege issue (1.8); conference with N. Bull and T. Cramton re additional research re same (1.4).
B470	06/21/24	T. Cramton	0.80	Review and analyze research findings and analysis (.4); multiple correspondence and conferences with N. Bull and H. Putre re same (.4).
B470	06/21/24	N. Bull	1.00	Review legal research, and confer with H. Putre and T. Cramton re same (1.0).
B470	06/22/24	N. Bull	1.00	Multiple correspondence with client and MWE team re discovery (.5); revise draft discovery parameters (.5).
B470	06/23/24	T. Cramton	0.70	Review and analyze revised search terms (.4); draft



**McDermott  
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LaVie Care Centers, LLC

Client: 120098  
Invoice: 3919213  
Invoice Date: 08/27/24

Task	Date	Name	Hours	Description
				revisions re same (.2); review correspondence re document collection (.1).
B470	06/23/24	N. Bull	1.50	Multiple conferences with MWE team and counsel re discovery (1.5).
B470	06/24/24	H. Putre	2.80	Confer with N. Bull and T. Cramton re privilege issues (.2); research, analyze, and report findings re privilege information (2.6).
B470	06/24/24	T. Cramton	2.00	Review updated UCC diligence requests (.3); conference with N. Bull re updates on document collection and review process (1.0); conference with N. Bull and J. Haims on same (.5); preliminary review of H. Putre legal analysis on privilege issue (.2).
B470	06/24/24	N. Bull	5.00	Multiple conferences with litigation and investigation teams re discovery (2.5); revise adversary papers (2.5).
B470	06/25/24	T. Cramton	0.70	Conference with N. Bull re case updates on Synergy issue (.4); review and analyze H. Putre's legal analysis on privilege issue (.3).
B470	06/25/24	E. Kwon	0.60	Prepare UCC data room documents for case development review (.6).
B470	06/25/24	N. Bull	3.80	Conference with J. Haims re discovery (.4); review legal research (1.0); review stay letter to plaintiffs (.4); continue to revise adversary papers (2.0).
B470	06/25/24	B. Paulsen	2.80	Conference with H. Udow to discuss research (.3); review and analyze scope of [REDACTED] laws (2.2); conference with team re potential claims (.3).
B470	06/26/24	T. Cramton	1.00	Participate in conference re document collection/review (.5); conference and multiple correspondence with MWE e-discovery team on process/considerations for document collection and planned productions (.2); preliminary review of existing document collections (.3).
B470	06/26/24	E. Kwon	0.20	Review new UCC data room documents in the discovery document repository for quality assurance (.2).
B470	06/26/24	N. Bull	2.50	Continue to revise adversary papers (2.5).
B470	06/26/24	B. Paulsen	3.10	Review and analysis of scope of potential fiduciary claims (3.1).
B470	06/27/24	E. Kwon	0.20	Review new UCC data room documents in the





LaVie Care Centers, LLC

Client: 120098  
Invoice: 3919213  
Invoice Date: 08/27/24

Task	Date	Name	Hours	Description
				discovery document repository for quality assurance (.2).
B470	06/27/24	N. Bull	3.00	Multiple conferences and correspondence with B. Jones and D. Simon re hearing (.4); review UCC filings (.4); conference with B. Jones and D. Simon re adversary (.7); continue to revise adversary papers (.6); review and analyze materials re additional cases for stay (.5); review and analyze order (.4).
B470	06/28/24	N. Bull	4.40	Multiple conferences with D. Simon, J. Muenker, J. Haims and D. Dias re investigation and discovery (2.5); continue to revise adversary papers (1.5); emails with D. Simon and plaintiffs' counsel re same (.4).
B470	06/30/24	N. Bull	2.00	Multiple correspondence with D. Simon and plaintiffs' counsel re adversary proceeding (.5); continue to revise adversary papers (1.0); multiple correspondence with MWE team re same (.5).

**Total Hours 1,334.00**

### Timekeeper Summary

Name	Hours	Rate	Amount
N. Alarif	0.60	1,525.00	915.00
L. Barrett	7.10	1,245.00	8,839.50
F. Belayneh	2.50	280.00	700.00
J. Bishop Jones	1.00	360.00	360.00
N. Bull	62.40	1,650.00	102,960.00
D. Butkovich	0.80	590.00	472.00
B. Casten	4.20	690.00	2,898.00
A. Chatham	2.80	1,525.00	4,270.00
T. Cramton	16.70	1,290.00	21,543.00
K. Dietrich	6.00	445.00	2,670.00
G. Dimick	2.70	1,040.00	2,808.00
N. Fomba	18.90	1,200.00	22,680.00
L. Foody	70.40	1,040.00	73,216.00
G. Fosheim	0.60	1,525.00	915.00
D. Golinghorst	3.80	1,155.00	4,389.00
J. Greathouse	18.20	1,525.00	27,755.00



LaVie Care Centers, LLC

Client: 120098  
 Invoice: 3919213  
 Invoice Date: 08/27/24

Name	Hours	Rate	Amount
J. Haake	149.50	1,335.00	199,582.50
J. Haims	91.50	1,830.00	167,445.00
M. Helt	2.20	1,750.00	3,850.00
J. Hoffman	1.90	385.00	731.50
J. Hunt	36.50	1,245.00	45,442.50
J. Jumbeck	118.10	1,245.00	147,034.50
E. Keil	220.60	1,245.00	274,647.00
M. Khurana	9.10	805.00	7,325.50
S. Kitchell	0.40	1,680.00	672.00
E. Kwon	5.80	570.00	3,306.00
C. Lee	49.20	1,155.00	56,826.00
D. Northrop	27.70	745.00	20,636.50
B. Paulsen	7.30	1,200.00	8,760.00
H. Putre	11.40	925.00	10,545.00
N. Rainey	4.70	500.00	2,350.00
A. Requejado	29.80	490.00	14,602.00
S. Scaletta	19.80	925.00	18,315.00
A. Sieber	0.30	385.00	115.50
D. Simon	166.70	1,650.00	275,055.00
R. Smethurst	2.30	1,650.00	3,795.00
A. Smith	5.00	805.00	4,025.00
E. Song	5.50	395.00	2,172.50
A. Squillante	7.70	385.00	2,964.50
R. Trickey	70.40	925.00	65,120.00
H. Udow	44.70	1,200.00	53,640.00
D. Valentino	3.80	280.00	1,064.00
M. Wallace	2.50	1,700.00	4,250.00
S. Wright	1.60	570.00	912.00
C. Zhu	19.30	1,040.00	20,072.00
<b>Totals</b>	<b>1,334.00</b>		<b>\$1,692,647.00</b>

## Task Code Summary

Task Code	Description	Hours	Amount
B110	Case Administration	71.50	60,754.50
B130	Asset Disposition	66.60	88,006.00
B140	Relief from Stay/Adequate Protection Proceedings	8.10	10,278.00



LaVie Care Centers, LLC

Client: 120098  
 Invoice: 3919213  
 Invoice Date: 08/27/24

Task Code	Description	Hours	Amount
B150	Mtgs/Communications w/Creditor	22.10	33,123.00
B155	Court Hearings	97.90	132,129.50
B160	Fee/Employment Applications	78.80	89,802.50
B190	Other Contested Matters	201.40	268,677.00
B195	Non-Working Travel	12.10	15,856.50
B210	Business Operations	73.20	96,953.00
B220	Employee Benefits/Pensions	13.80	13,602.00
B230	Financing/Cash Collections	222.30	253,555.00
B240	Tax Issues	4.90	6,077.00
B270	Utilities	15.30	20,176.50
B280	Vendor Matters	16.10	20,366.00
B290	Insurance	32.80	39,673.50
B310	Claims Administration & Object	9.20	11,560.00
B320	Plan and Disclosure Statement	85.80	100,370.50
B410	Gen Bankruptcy Advice/Opinions	3.50	4,672.50
B430	Internal Investigation	194.20	277,627.00
B470	Litigation	104.40	149,387.00
		1,334.00	1,692,647.00

**EXHIBIT B**

**Expense Detail**



LaVie Care Centers, LLC

Client: 120098  
 Invoice: 3919213  
 Invoice Date: 08/27/24

## Costs and Other Charges

Description	Amount
Business Meal	78.10
Dinner meals on 6/2/2024 (D. Simon, J. Haake and E. Keil)	
Business Meal	11.76
Lunch meal on 6/3/2024 - LaVie Care Centers first-day hearing in Atlanta, GA (E. Keil)	
Business Meal	9.99
Breakfast meal on 6/3/2024 - LaVie Care Centers first-day hearing in Atlanta, GA (E. Keil)	
Business Meal	303.12
Dinner meals on 6/6/2024 (D. Simon and B. Jones)	
Business Meal	390.33
Dinner meals on 6/25/2024 (D. Simon, B. Jones and J. Decker)	
Business Meal	28.69
Dinner meal on 6/26/2024 - LaVie Care Centers second-day hearing (J. Haake)	
Business Meal	12.68
Lunch meal on 6/26/2024 - LaVie Care Centers second-day hearing (J. Jumbeck)	
Business Meal	49.38
Dinner meal on 6/26/2024 - LaVie Care Centers second-day hearing (J. Jumbeck)	
Business Meal	8.98
Breakfast meal on 6/27/2024 - LaVie Care Centers second-day hearing (J. Jumbeck)	
Business Meal	15.38
Lunch meal on 6/27/2024 - LaVie Care Centers second-day hearing (J. Jumbeck)	
Business Meal	49.38
Dinner meal on 6/27/2024 - LaVie Care Centers second-day hearing (J. Jumbeck)	
Business Meal	31.30
Dinner meal on 6/27/2024 - LaVie Care Centers second-day hearing (J. Haake)	
Business Meal	26.02
Lunch meal on 6/27/2024 - LaVie Care Centers second-day hearing (J. Haake)	
Business Meal	124.54
Dinner meals on 6/27/2024 (D. Simon and J. Muenker)	
Business Meal	32.10
Lunch meals on 6/28/2024 (D. Simon and J. Jumbeck)	
Business Meal	16.11
Lunch meal on 6/28/2024 - LaVie Care Centers second-day hearing (J. Jumbeck)	
Business Meal	8.79
Breakfast meal on 6/28/2024 - LaVie Care Centers second-day hearing (J. Jumbeck)	
Computer Research	6,792.19
Computer Research - Westlaw	
Computer Research	72.40
VENDOR: CourtAlert.com Inc.; INVOICE#: 310026-2406; DATE: 06/30/2024 - Vendor CourtAlert.com, Inc. fee for case research and monitoring	



LaVie Care Centers, LLC

Client: 120098  
Invoice: 3919213  
Invoice Date: 08/27/24

Description	Amount
Computer Usage Charge - Data Review & Production Software	4,000.00
"June monthly fee for Discovery Platform Use (RelativityOne, 364.60 GBs)"	
Computer Usage Charge - Data Review & Production Software	1,968.80
"June monthly fee for Data Processing (RelativityOne, 49.22 GBs)"	
Document Services	254.77
VENDOR: ezCater, Inc.; INVOICE#: INVE-37973; DATE: 6/15/2024 - LaVie deposition meeting	
Document Services	211.28
VENDOR: ezCater, Inc.; INVOICE#: INVE-37973; DATE: 6/15/2024 - LaVie deposition meeting	
Document Services	27.60
VENDOR: Georgia Messenger Service LLC; INVOICE#: 8547-34; DATE: 6/8/2024 - USDC, Atlanta, GA	
Document Services	675.00
VENDOR: CT Corporation; INVOICE#: 31282830-RI; DATE: 6/17/2024 - service fees and cost associated with obtaining certified corporate documents	
Document Services	7,697.00
VENDOR: CT Corporation; INVOICE#: 31298593-RI; DATE: 6/18/2024 - service fees and cost associated with obtaining certified corporate documents	
Document Services	982.00
VENDOR: CT Corporation; INVOICE#: 31326671-RI; DATE: 6/20/2024 - service fees and costs associated with obtaining certified corporate documents	
Messenger/Courier	27.93
VENDOR: Federal Express Corporation; INVOICE#: 852750797; DATE: 6/11/2024 - weekly FedEx shipping charges	
Miscellaneous	1,738.00
Chapter 11 filing fee for Centennial Healthcare Corporation, Case No. 24-55504 (U.S. Bankruptcy Court for the Northern District of Georgia)	
Miscellaneous	1,738.00
Chapter 11 filing fee for LV Operations I, LLC, Case No. 24-55505 (U.S. Bankruptcy Court for the Northern District of Georgia)	
Miscellaneous	1,738.00
Chapter 11 filing fee for LV Operations II, LLC, Case No. 24-55506 (U.S. Bankruptcy Court for the Northern District of Georgia)	
Miscellaneous	1,738.00
Chapter 11 filing fee for LaVie Care Centers, LLC, Case No. 24-55507 (U.S. Bankruptcy Court for the Northern District of Georgia)	
Miscellaneous	500.00
Pro hac vice application fees for E. Keil, J. Jumbeck, J. Haake, C. Lee and N. Bull	
Miscellaneous	199.00



LaVie Care Centers, LLC

Client: 120098  
Invoice: 3919213  
Invoice Date: 08/27/24

Description	Amount
Filing fee for motion for order authorizing sale of assets pursuant to section 363 of Bankruptcy Code (In re LaVie Care Centers, LLC, et al., Case No. 24-55507-pmb (U.S. Bankruptcy Court for the Northern District of Georgia))	
Miscellaneous	714.00
Transcript of first-day hearing held on June 4, 2024 in In re LaVie Care Centers, LLC, et al., Case No. 24-55507-pmb (U.S. Bankruptcy Court for the Northern District of Georgia)	
Search Fees	20.00
VENDOR: Chapter 11 Dockets; INVOICE#: 135379; DATE: 6/17/2024 - Chapter 11 Dockets (charges for May 2024)	
Search Fees	498.39
VENDOR: Chapter 11 Dockets; INVOICE#: 135379; DATE: 6/17/2024 - Chapter 11 Dockets (charges for May 2024)	
Transportation/Parking	283.57
Uber ride from Atlanta to court hearing in Newnan, GA for five people on 6/4/2024 (D. Simon)	
Transportation/Parking	51.11
Uber ride from MWE Atlanta office to Newnan bankruptcy court on 6/4/2024 (E. Keil)	
Transportation/Parking	57.19
Uber ride from Newnan bankruptcy court to MWE Atlanta office on 6/4/2024 (E. Keil)	
Transportation/Parking	54.72
Taxi in Texas from airport to home on 6/5/2024 (J. Haake)	
Transportation/Parking	35.65
Uber ride from Atlanta office to airport on 6/5/2024 (E. Keil)	
Transportation/Parking	40.71
Uber ride from home to Chicago airport on 6/26/2024 (J. Jumbeck)	
Transportation/Parking	51.00
Uber ride from Atlanta airport to MWE office on 6/26/2024 (J. Jumbeck)	
Transportation/Parking	33.30
Uber ride on 6/26/2024 (J. Haake)	
Transportation/Parking	50.00
Uber ride on 6/26/2024 (J. Haake)	
Transportation/Parking	28.69
Uber ride to court hearing on 6/27/2024 (J. Haake)	
Transportation/Parking	37.06
Taxi ride from MWE office to Atlanta courthouse on 6/27/2024 (J. Jumbeck)	
Transportation/Parking	49.30
Taxi ride from Atlanta courthouse to MWE office on 6/27/2024 (J. Jumbeck)	
Transportation/Parking	41.92
Uber ride on 6/28/2024 (J. Haake)	





LaVie Care Centers, LLC

Client: 120098  
Invoice: 3919213  
Invoice Date: 08/27/24

Description	Amount
Transportation/Parking	39.48
Uber ride on 6/28/2024 (J. Haake)	
Transportation/Parking	38.77
Uber ride from hotel to Atlanta airport on 6/29/2024 (J. Jumbeck)	
Travel Expenses	252.42
Hotel stay in Atlanta, GA on 6/3/2024 (J. Haake)	
Travel Expenses	420.50
Hotel stay in Atlanta, GA on 6/4/2024 (J. Haake)	
Travel Expenses	1,533.93
Hotel stay in Atlanta, GA on 6/2 - 6/5 (E. Keil)	
Travel Expenses	936.96
Round trip airfare (Dallas, TX - Atlanta, GA) on 6/26 - 6/28 (J. Haake)	
Travel Expenses	330.36
Hotel stay in Atlanta, GA on 6/26/2024 (J. Haake)	
Travel Expenses	789.75
Round trip airfare (Chicago, IL - Atlanta, GA) on 6/26 - 6/29 (J. Jumbeck)	
Travel Expenses	329.02
Hotel stay in Atlanta, GA on 6/27/2024 (J. Haake)	
Travel Expenses	608.52
Hotel stay in Atlanta, GA on 6/26 - 6/29 (J. Jumbeck)	
<b>Total Costs and Other Charges</b>	<b>\$38,882.94</b>



**EXHIBIT A-2**

**Second Monthly Fee Statement**  
***July 1, 2024 – July 31, 2024***

**IN THE UNITED STATES BANKRUPTCY COURT  
NORTHERN DISTRICT OF GEORGIA  
ATLANTA DIVISION**

In re:	)	
	)	Chapter 11
	)	
LAVIE CARE CENTERS, LLC, <i>et al.</i> ,	)	Case No. 24-55507 (PMB)
	)	
Debtors. <sup>1</sup>	)	(Jointly Administered)
	)	
	)	<b>Obj. Deadline: October 14, 2024</b>
	)	

**SUMMARY OF SECOND MONTHLY FEE STATEMENT OF  
MCDERMOTT WILL & EMERY LLP, COUNSEL TO THE DEBTORS AND  
DEBTORS-IN-POSSESSION, FOR ALLOWANCE OF COMPENSATION AND  
REIMBURSEMENT OF EXPENSES FOR THE PERIOD  
FROM JULY 1, 2024 THROUGH JULY 31, 2024**

Name of Applicant:	<b>MCDERMOTT WILL &amp; EMERY LLP</b>
Authorized to provide professional services to:	<b>Debtors and Debtors-in-Possession</b>
Date of retention:	<b>July 19, 2024, effective as of June 2, 2024</b>
Period for which compensation and reimbursement is sought:	<b>July 1, 2024 through July 31, 2024</b>
Amount of compensation sought as actual, reasonable and necessary:	<b>\$1,036,973.50</b>
Amount of expense reimbursement sought as actual, reasonable and necessary:	<b>\$13,899.83</b>
This is a:	<b>Second Monthly Fee Statement</b>

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<sup>1</sup> The last four digits of LaVie Care Centers, LLC's federal tax identification number are 5592. There are 282 Debtors in these chapter 11 cases, which are being jointly administered for procedural purposes only. A complete list of the Debtors and the last four digits of their federal tax identification numbers are not provided herein. A complete list of such information may be obtained on the website of the Debtors' claims and noticing agent at <https://www.veritaglobal.net/LaVie>. The location of LaVie Care Centers, LLC's corporate headquarters and the Debtors' service address is 1040 Crown Pointe Parkway, Suite 600, Atlanta, GA 30338.

**Prior Fee Statements:**

<b>Document</b>	<b>Date Served</b>	<b>Period Covered</b>	<b>Requested Fees/Expenses</b>	<b>Objections Served</b>
<b>First Monthly Fee Statement</b>	August 26, 2024	6/2/24 – 6/30/24	\$1,692,647.00/ \$38,882.94	None

**LAVIE CARE CENTERS, LLC, ET AL.  
SUMMARY OF BILLING BY PROFESSIONAL  
JULY 1, 2024 THROUGH JULY 31, 2024**

<b>Name of Professional Person</b>	<b>Date of Bar Admission</b>	<b>Position with the Applicant and Practice Area</b>	<b>Hourly Billing Rate</b>	<b>Total Billed Hours</b>	<b>Total Compensation</b>
Gary Karch	1980	Counsel; U.S. & International Tax	\$2,210	2.8	\$6,188.00
Michael Wilder	1995	Partner; U.S. & International Tax	\$1,975	1.0	\$1,975.00
Joel C. Haims	1994	Partner; Trial	\$1,830	49.8	\$91,134.00
Daniel M. Simon	2008	Partner; Corporate Advisory	\$1,650	111.1	\$183,315.00
Nathan M. Bull	2006	Partner; Trial	\$1,650	86.1	\$142,065.00
Jack G. Haake	2011	Associate; Corporate Advisory	\$1,335	30.8	\$41,118.00
Tim C. Cramton	2018	Associate; Trial	\$1,290	11.3	\$14,577.00
Emily C. Keil	2018	Associate; Corporate Advisory	\$1,245	162.6	\$202,437.00
Jake Jumbeck	2017	Associate; Corporate Advisory	\$1,245	70.3	\$87,523.50
Luke B. Barrett	2019	Associate; Corporate Advisory	\$1,245	12.3	\$15,313.50
Hilary Udow	2020	Associate; Trial	\$1,200	12.8	\$15,360.00
Benjamin Paulsen	2018	Associate; Private Client	\$1,200	5.1	\$6,120.00
Crystal N. Fomba	2021	Associate; Trial	\$1,200	41.1	\$49,320.00
Catherine T. Lee	2021	Associate; Corporate Advisory	\$1,155	59.1	\$68,260.50
Chenjia Zhu	2022	Associate; Trial	\$1,040	16.9	\$17,576.00
Landon Foody	2023	Associate; Corporate Advisory	\$1,040	37.9	\$39,416.00
Rebecca E. Trickey	2022	Associate; Corporate Advisory	\$925	17.7	\$16,372.50

<b>Name of Professional Person</b>	<b>Date of Bar Admission</b>	<b>Position with the Applicant and Practice Area</b>	<b>Hourly Billing Rate</b>	<b>Total Billed Hours</b>	<b>Total Compensation</b>
Daniel Northrop	N/A	Paralegal; Corporate Advisory	\$745	27.4	\$20,413.00
Benjamin Casten	N/A	Discovery Consultant	\$690	0.7	\$483.00
Edward Kwon	N/A	Manager of Technology Project Management	\$570	2.6	\$1,482.00
Nolley Rainey	N/A	Paralegal; Corporate Advisory	\$500	13.1	\$6,550.00
Ethan Song	N/A	Paralegal; IP Litigation	\$395	6.5	\$2,567.50
A.J. Squillante	N/A	Paralegal; Trial	\$385	7.8	\$3,003.00
Jacque Bishop Jones	N/A	Paralegal; Corporate Advisory	\$360	8.5	\$3,060.00
Daniel Valentino	N/A	Litigation Technology Data Analyst	\$280	0.8	\$224.00
Andy Garcia	N/A	Litigation Technology Data Analyst	\$280	4.0	\$1,120.00
<b>TOTALS</b>				<b>800.1</b>	<b>\$1,036,973.50</b>

**LAVIE CARE CENTERS, LLC, ET AL.  
COMPENSATION BY PROJECT CATEGORY  
JULY 1, 2024 THROUGH JULY 31, 2024**

<b>Project Category</b>	<b>Total Hours</b>	<b>Total Fees</b>
Case Administration	2.3	\$1,863.50
Asset Disposition	11.6	\$13,681.00
Relief from Stay / Adequate Protection Proceedings	4.1	\$4,771.50
Meetings/Communications with Creditors	11.3	\$15,265.00
Court Hearings	51.9	\$76,698.50
Fee/Employment Applications	27.8	\$30,754.50
Fee/Employment Objections	2.8	\$2,912.00
Assumption/Rejection of Leases	4.2	\$5,229.00
Other Contested Matters	193.4	\$256,165.50
Non-Working Travel	5.3	\$8,745.00
Business Operations	105.7	\$102,974.00
Financing/Cash Collections	2.1	\$2,614.50
Tax Issues	3.8	\$8,163.00
Utilities	2.4	\$3,042.00
Vendor Matters	10.0	\$13,678.50
Insurance	6.1	\$7,817.50
Claims Administration & Objections	16.1	\$20,040.00
Plan and Disclosure Statement	127.4	\$160,089.00
Internal Investigation	132.9	\$188,703.50
Litigation	78.9	\$113,766.00
<b>TOTALS</b>	<b>800.1</b>	<b>\$1,036,973.50</b>

**LAVIE CARE CENTERS, LLC, ET AL.  
EXPENSE SUMMARY  
JULY 1, 2024 THROUGH JULY 31, 2024**

<b>Expense Category</b>	<b>Service Provider (if applicable)</b>	<b>Total Expenses</b>
Computer-Assisted Research	Various	\$6,252.86
Transcripts	N/A	\$1,209.50
Courier Services	FedEx	\$31.20
Travel Expenses	Various	\$1,760.87
Business Meals	Various	\$562.60
Discovery Hosting Charges	RelativityOne	\$4,082.80
<b>TOTAL</b>		<b>\$13,899.83</b>



**EXHIBIT A**

**Time Detail**



Invoice: 3939913  
Client: 120098

09/30/24

LaVie Care Centers, LLC  
1040 Crown Pointe Parkway  
Atlanta, GA 30338

For Services Rendered in Connection with:

Matter: 0013 Chapter 11

Task	Date	Name	Hours	Description
B110	07/02/24	D. Northrop	1.80	Communications with MWE team re new case dates and deadlines (.3); research for sample notices of filing for affidavits of publication (1.4); correspondence with J. Haake re research (.1).
B110	07/17/24	D. Northrop	0.10	Communications with MWE team re new case dates and deadlines (.1).
B110	07/18/24	D. Northrop	0.10	Communications with MWE team re new case dates and deadlines (.1).
B110	07/25/24	E. Keil	0.30	Correspondence with KCC team re service, noticing (.3).
B130	07/01/24	L. Foody	1.30	Conference with D. Simon re NDAs (.3); revise NDAs (.7); review and revise additional NDA (.3).
B130	07/01/24	D. Simon	0.50	Conference with L. Foody re NDA process and review (.5).
B130	07/02/24	L. Foody	0.70	Review and revise NDAs (.7).
B130	07/03/24	L. Foody	0.70	Review and revise NDAs (.7).
B130	07/03/24	D. Northrop	0.30	Draft notice of affidavit of publication of auction and sale hearing notice (.3).
B130	07/03/24	D. Simon	0.30	Multiple correspondence with Stout and L. Foody re sale process and NDAs (.3).
B130	07/08/24	L. Foody	1.80	Review and comment on four NDAs (1.8).
B130	07/08/24	E. Keil	0.20	Conference with M. Kakovsky, A. Masotta, et al. re sale status update (.2).
B130	07/08/24	D. Simon	0.60	Multiple conferences with Stout and Ankura re sale process letter (.4); revisions to same (.2).
B130	07/10/24	L. Foody	1.20	Review and revise three NDAs (1.2).
B130	07/15/24	D. Simon	0.70	Conference with client re sale process (.3); communications with Committee re same (.4).
B130	07/16/24	L. Foody	0.30	Review and revise NDA (.3).
B130	07/18/24	L. Foody	0.50	Review and revise NDAs (.5).
B130	07/22/24	L. Foody	0.40	Review and revise two NDAs (.4).
B130	07/22/24	J. Haake	0.30	Conference with J. Brilliant re contract notice and



**McDermott  
Will & Emery**

LaVie Care Centers, LLC

Client: 120098  
Invoice: 3939913  
Invoice Date: 09/30/24

Task	Date	Name	Hours	Description
				sale process issues (.3).
B130	07/23/24	J. Haake	1.00	Correspondence and conferences with J. Brilliant and A. Dalsass re finalizing cure notice and filing same (1.0).
B130	07/26/24	L. Foody	0.30	Review and revise NDA (.3).
B130	07/29/24	L. Foody	0.30	Review and revise NDA (.3).
B130	07/30/24	L. Foody	0.20	Review and revise NDA (.2).
B140	07/01/24	C. Lee	0.80	Correspond with MWE team re potential stay violation (.2); review and summarize precedent re expedited stay extension proceedings (.5); correspond with D. Simon, MWE team re same (.1).
B140	07/02/24	C. Lee	2.30	Review and analyze complaint, pleadings re potential violation of automatic stay (.8); correspond with N. Bull, MWE team re same (.2); draft form letter re violation of automatic stay (.5); review and analyze precedent, case law re same (.6); correspond with D. Simon re same (.1); correspond with E. Keil, MWE team re adversary proceeding to extend automatic stay (.1).
B140	07/03/24	C. Lee	0.10	Correspond with N. Bull re stay violation (.1).
B140	07/08/24	C. Lee	0.50	Review and revise letter re automatic stay violation (.4); correspond with N. Bull, MWE team re same (.1).
B140	07/31/24	E. Keil	0.40	Correspondence with plaintiffs' counsel re automatic stay relief requests (.3); correspondence with J. Haake re same (.1).
B150	07/01/24	D. Northrop	0.60	Review draft notice of continued section 341 meeting of creditors and correspondence with E. Keil re revision to same (.1); file notice of continued section 341 meeting of creditors (.3); review procedures for obtaining audio files of section 341 meetings from the office of the US Trustee (.1); correspondence with E. Keil re same (.1).
B150	07/02/24	D. Simon	0.80	Conference with F. Lawall re open issues (.5); communications with Ankura re same (.3).
B150	07/05/24	D. Simon	2.80	Multiple conferences with Committee re second-day diligence items (1.8); follow up discussions with Ankura and client re same (1.0).
B150	07/08/24	D. Northrop	1.00	Correspondence with office of the U.S. Trustee re obtaining audio file of 6.28.24 section 341 meeting



LaVie Care Centers, LLC

Client: 120098  
Invoice: 3939913  
Invoice Date: 09/30/24

Task	Date	Name	Hours	Description
				of creditors (.1); obtain audio files (3) of the 6.28.24 section 341 meeting of creditors (.1); review audio files (.2); correspondence with E. Keil re preparation of transcript of 6.28.24 section 341 meeting of creditors (.1); arrange for preparation of transcript of section 341 meeting of creditors (.5).
B150	07/09/24	E. Keil	1.70	Conference with F. Lawall, D. Kovsky re hearing issues (.8); correspondence with Third Wave, United Healthcare re recoupment issues (.3); correspondence with PCOs re introduction (.6).
B150	07/12/24	E. Keil	0.80	Draft responses to UST re 341 meeting requests (.8).
B150	07/16/24	E. Keil	0.30	Correspondence with PCOs re introduction (.3).
B150	07/17/24	E. Keil	0.60	Conferences with creditors re bar date notice (.4); correspondence with UCC re data room requests (.2).
B150	07/17/24	D. Northrop	0.30	Obtain transcript of 6.28.24 section 341 meeting of creditors from the transcriber (.1); review same (.1); correspondence with MWE team re same (.1).
B150	07/18/24	D. Simon	1.70	Numerous conferences with Ankura re Committee diligence and related issues (1.7).
B150	07/19/24	E. Keil	0.40	Correspondence with PCOs (.3); correspondence with J. Watson re same (.1).
B150	07/24/24	E. Keil	0.30	Correspondence with V. Jones re 341 meeting (.3).
B155	07/01/24	D. Northrop	0.50	Obtain transcript of 6.28.24 on Debtors' requests for entry of final orders with respect to certain first-day motions and Debtors' motion for approval of bidding procedures (.1); review transcript (.3); correspondence with MWE team re hearing transcript (.1).
B155	07/08/24	E. Keil	0.50	Draft agenda re omnibus hearing (.5).
B155	07/09/24	D. Northrop	0.60	Review draft of Debtors' agenda for 7.10.24 omnibus hearing (.1); correspondence with E. Keil re revision to the draft agenda (.1); file Debtors' agenda (.2); review draft of Debtors' amended agenda for 7.10.24 omnibus hearing (.1); file of Debtors' amended agenda for 7.10.24 omnibus hearing (.1).
B155	07/09/24	E. Keil	1.90	Revise hearing agenda (.4); prepare for omnibus hearing (1.3); correspondence with A. Marchant-Lessa re uploaded orders (.2).



LaVie Care Centers, LLC

Client: 120098  
Invoice: 3939913  
Invoice Date: 09/30/24

Task	Date	Name	Hours	Description
B155	07/10/24	E. Keil	1.40	Correspondence with D. Simon re hearing preparation (.5); correspondence with D. Northrop re filing agenda (.1); prepare for and attend omnibus hearing (.5); correspondence with A. Marchant-Lessa re court orders (.3).
B155	07/10/24	D. Simon	1.70	Prepare for and participate in virtual hearing (1.7).
B155	07/10/24	D. Northrop	0.30	Prepare transcript request for 7.10.24 omnibus hearing (.2); submit transcript request to the transcriber (.1).
B155	07/19/24	N. Bull	5.00	Prepare for PI hearing and review Recovery Corp.'s opposition papers (5.0).
B155	07/22/24	E. Keil	1.50	Prepare for hearing re adversary proceeding (.5); draft agenda, witness and exhibit list (.7); revise same (.3).
B155	07/22/24	N. Bull	4.90	Prepare for hearing (4.5); telephone conferences with D. Simon and J. Anthony re hearing and dispute (.4).
B155	07/23/24	N. Bull	10.00	Prepare for hearing, including draft outline, review materials and legal research, and meetings with D. Simon and B. Jones (10.0).
B155	07/23/24	E. Keil	1.40	Prepare for hearing (1.4).
B155	07/24/24	N. Bull	3.50	Prepare for and participate in preliminary injunction hearing (3.5).
B155	07/24/24	C. Lee	1.60	Prepare for and virtually attend hearing re extension of automatic stay (1.6).
B155	07/24/24	D. Northrop	0.40	Prepare transcript order for 7.24.24 omnibus hearing and hearing re Debtors' motion for extension of automatic stay in Adv. Pro. 24-5127 (.2); revise submit transcript request (.1); submit transcript request to the transcriber via email (.1).
B155	07/24/24	E. Keil	2.80	Prepare for and attend hearing re stay extension motion (2.1); conference with D. Simon re same (.7).
B155	07/24/24	D. Simon	3.00	Prepare and attend adversary proceeding hearing (3.0).
B155	07/25/24	D. Northrop	0.50	Obtain transcript of 7.24.24 omnibus hearing, including hearing on Debtors' motion to extend the automatic stay in Adv. Pro. 24-5127 (PMB) (.2); review transcript (.2); correspondence with MWE team re same (.1).



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LaVie Care Centers, LLC

Client: 120098  
Invoice: 3939913  
Invoice Date: 09/30/24

Task	Date	Name	Hours	Description
B155	07/31/24	C. Lee	1.80	Participate in telephonic hearing re 2004 motion (1.8).
B155	07/31/24	N. Bull	3.00	Participate in hearing on 2004 motion (2.0); conferences and emails with D. Simon and E. Keil re preparation for same (1.0).
B155	07/31/24	E. Keil	2.60	Prepare hearing demonstrative (.7); prepare for and attend hearing on 2004 motion (1.9).
B155	07/31/24	D. Simon	2.70	Prepare for and participate in 2004 hearing (2.7).
B155	07/31/24	D. Northrop	0.30	Prepare request for transcript of 7.31.24 hearing on the Committee's motion for Rule 2004 examinations (.2); submit transcript request to the transcriber via email (.1).
B160	07/03/24	D. Northrop	0.10	Review application of the Official Committee of Unsecured Creditors to retain and employ Troutman Pepper Hamilton Sanders, LLP as counsel, and correspondence with MWE team re same (.1).
B160	07/05/24	L. Foody	1.70	Review and revise time entries for privilege issues and compliance with Local Rules (1.7).
B160	07/15/24	C. Lee	4.20	Research legal issues re retention (3.6); correspond with E. Keil re same (.1); summarize findings re same (.5).
B160	07/15/24	L. Foody	4.50	Revise June time entries for privilege issues and compliance with Local Rules (4.5).
B160	07/15/24	E. Keil	1.20	Research re 327(a) retention (1.2).
B160	07/16/24	C. Lee	0.30	Research legal issues re retention (.2); correspond with E. Keil re same (.1).
B160	07/16/24	D. Simon	1.20	Review and research re 327 issues (1.2).
B160	07/17/24	L. Foody	3.00	Continue to review and revise time entries for privilege issues and compliance with Local Rules (3.0).
B160	07/17/24	E. Keil	0.30	Correspondence with J. Watson, R. Ahmed, et al. re OCP motion (.3).
B160	07/17/24	D. Northrop	0.10	Review application of the Official Committee of Unsecured Creditors to retain and employ FTI Consulting, Inc. (.1).
B160	07/18/24	D. Northrop	0.10	Review order granting the Official Committee of Unsecured Creditors' application to retain and employ FTI Consulting, Inc. as financial advisor, and correspondence with MWE team re same (.1).
B160	07/19/24	D. Northrop	0.40	Review proposed order authorizing Debtors to



LaVie Care Centers, LLC

Client: 120098  
Invoice: 3939913  
Invoice Date: 09/30/24

Task	Date	Name	Hours	Description
				employ and pay ordinary course professionals, and correspondence with E. Keil re proposed revision to same (.1); upload proposed ordinary course professionals order (.1); review revised proposed ordinary course professionals order and correspondence with E. Keil re additional changes to the proposed order requested by the court (.1); upload revised proposed ordinary course professionals order (.1).
B160	07/19/24	E. Keil	1.40	Revise OCP order per chambers instructions (.6); correspondence with A. Marchant-Lessa re same (.3); correspondence with D. Northrop re same (.2); correspondence with J. Watson, R. Ahmed, et al. re OCP order and declarations (.3).
B160	07/23/24	L. Foody	1.20	Review and revise time entries for privileged and confidential information (1.2).
B160	07/24/24	L. Foody	4.10	Review and revise time entries for privileged and confidential information (4.1).
B160	07/25/24	L. Foody	0.60	Review and revise supplemental time entries for privileged and confidential information (.6).
B160	07/26/24	L. Foody	2.40	Continue to review and revise time entries for privilege issues and compliance with Local Rules (2.4).
B160	07/31/24	E. Keil	1.00	Conference with L. Foody re OCP declarations (.7); correspondence with D. Simon, J. Brilliant re same (.3).
B170	07/22/24	L. Foody	1.10	Research re financial advisor retention terms (1.1).
B170	07/23/24	L. Foody	0.50	Draft email to UCC counsel re financial advisor retention (.5).
B170	07/24/24	L. Foody	0.20	Correspondence with UCC counsel re retention application (.2).
B170	07/25/24	L. Foody	1.00	Review and analyze UCC's response re retention application language (1.0).
B185	07/16/24	E. Keil	0.30	Revise contract cure notice (.3).
B185	07/23/24	E. Keil	1.70	Review cure notice (.9); correspondence with Ankura, KCC team re same (.5); compile for filing (.3).
B185	07/29/24	E. Keil	0.20	Correspondence with J. Jumbeck re contract cure notice (.2).
B185	07/30/24	E. Keil	1.00	Conference with A. Dalsass, J. Brilliant re cure





LaVie Care Centers, LLC

Client: 120098  
Invoice: 3939913  
Invoice Date: 09/30/24

Task	Date	Name	Hours	Description
B185	07/31/24	E. Keil	1.00	notice revisions (.5); correspondence with same re same (.2); correspondence with L. Aiken re same (.2); correspondence with creditor re same (.1). Draft tracker of cure objection issues (.3); correspondence with contract counterparties re cure notice (.2); correspondence with J. Brilliant re same (.2); conference with D. Simon re same (.3).
B190	07/01/24	J. Bishop Jones	2.00	Communications with C. Lee re complaint filing (.2); review same (.2); review and analyze NDGA rules and procedures (.3); communications with D. Simon re filing (.2); file same (.6); prepare and file motion to extend stay (.2); prepare and file brief ISO motion to extend stay (.2); circulate same to MWE team (.1).
B190	07/01/24	E. Keil	0.50	Correspondence with L. Aiken re data room (.2); correspondence with UCC counsel re same (.3).
B190	07/01/24	D. Simon	3.20	Conference with investigation team re investigation issues (1.0); multiple conferences with D. Dias and J. Muenker re same (1.6); conference with N. Bull re email issues (.3); follow up re adversary proceeding filing (.3).
B190	07/01/24	D. Northrop	1.60	Review docket sheet for Adv. Pro. 24-05127 (LaVie Care Centers, LLC v. Healthcare Negligence Settlement Recovery Corp.) (.1); research re adversary proceeding filing fee in the Northern District of Georgia (.7); communications with J. Bishop Jones re non-applicability of the adversary proceeding filing fee (.1); correspondence with MWE team re arranging for MWE team members to receive ECF notifications in Adv. Pro. 24-05127 (.1); arrange for MWE team members re same (.1); review summons issued in Adv. Pro. 24-05127, LaVie Care Centers, LLC. v. Healthcare Negligence Settlement Recovery Corp. (.1); correspondence with MWE team re issues relating to service of summons and complaint (.4).
B190	07/02/24	E. Keil	0.20	Correspondence with L. Aiken re data room (.2).
B190	07/02/24	D. Simon	2.50	Participate in investigation meeting with J. Muenker (.5); follow up discussions re same (.3); conference with K. Shapiro and D. Thomas re open litigation



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LaVie Care Centers, LLC

Client: 120098  
Invoice: 3939913  
Invoice Date: 09/30/24

Task	Date	Name	Hours	Description
				claims (.4); conference with N. Bull re open litigation issues and Synergy emails (.7); conference with J. Anthony re adversary (.3); communications with Empirian attorneys re open lawsuit (.3).
B190	07/03/24	D. Simon	0.90	Conferences with D. Thomas and others re outstanding litigation (.4); revisions to automatic stay letter (.2); communications with K. Shapiro re open litigation claims (.3).
B190	07/04/24	E. Keil	0.30	Correspondence with KCC team re service of summons (.3).
B190	07/06/24	D. Simon	0.50	Conference with J. Muenker re investigation and email issues (.5).
B190	07/06/24	D. Northrop	0.10	Review certificate of service for summons issued in Adv. Pro. 24-5127 (.1).
B190	07/08/24	E. Keil	1.90	Conference with G. Hayes, C. Bryson, et al. re UCC requests (.7); conference with D. Simon, B. Jones, et al. re same (.5); conference with R. Ahmed re UST requests (.3); review and compile same (.4).
B190	07/08/24	D. Simon	3.50	Conference with J. Haims and N. Bull re email issues (.6); communications with J. Muenker re same (.4); multiple conferences with Ankura team re second-days (1.4); review second-day revisions and representations (.4); conference with F. Lawall re same (.3); conference with DIP lenders re second-days (.4).
B190	07/09/24	D. Simon	0.40	Conference with J. Muenker re case issues and investigation matters (.4).
B190	07/09/24	L. Foody	0.50	Research re 9019 motion (.5).
B190	07/09/24	E. Keil	3.40	Conference with B. Jones, R. Ahmed, et al. re revisions to first-day orders (.9); revise same (1.2); correspondence with F. Lawall, et al. re same (.2); conference with D. Simon re same (.3); revise notices of final orders re same (.4); prepare same for filing (.2); correspondence with L. Foody re 9019 motion (.2).
B190	07/10/24	E. Keil	1.00	Conference with MWE litigation team re status update (.3); prepare responses re investigation inquiries (.7).
B190	07/10/24	D. Simon	2.80	Conference with J. Anthony re adversary (.6); follow up with N. Bull re same (.4); review and



LaVie Care Centers, LLC

Client: 120098  
Invoice: 3939913  
Invoice Date: 09/30/24

Task	Date	Name	Hours	Description
				analyze Committee diligence issues (.7); conferences with Ankura re same (.4); follow up re various second-day payments and related motions (.7).
B190	07/10/24	L. Foody	1.90	Review background information re settlement (.4); draft 9019 settlement motion re same (1.5).
B190	07/11/24	C. Lee	3.70	Research legal issues re indemnification claims (3.2); summarize findings re same (.4); conference with D. Simon re same (.1).
B190	07/11/24	L. Foody	3.10	Continue to draft 9019 motion (3.1).
B190	07/11/24	E. Keil	3.00	Conference with G. Hayes, B. Jones, et al. re UCC diligence requests (1.2); conferences with D. Simon re responses to same (.3); draft responses re same (1.5).
B190	07/11/24	D. Simon	2.20	Conference with Synergy re Committee diligence requests (1.0); multiple conferences with Ankura re same (.7); draft and revise responses (.5).
B190	07/12/24	D. Simon	2.50	Multiple conferences with Ankura re second-day relief issues (.7); conferences with Synergy re same (.5); review and analyze Synergy issues (.6); respond to Committee diligence requests (.7).
B190	07/15/24	C. Lee	3.60	Research legal issues re extension of automatic stay (3.6).
B190	07/15/24	L. Foody	0.80	Revise 9019 settlement motion (.8).
B190	07/15/24	E. Keil	2.30	Revise 9019 settlement motion (1.6); review and upload responsive documents to data room (.7).
B190	07/16/24	C. Lee	0.60	Research legal issues re extension of automatic stay (.6).
B190	07/16/24	E. Keil	2.00	Conference with G. Hayes, B. Jones, et al. re UCC diligence requests (1.0); conference with F. Lawall, D. Kovsky, et al. re same (1.0).
B190	07/16/24	D. Simon	4.10	Conferences with Synergy re UCC diligence requests (.7); internal discussions re same (.4); conference with Committee re diligence requests (1.0); participate in Ankura presentation to investigative Committee (1.5); conferences with B. Jones and J. Decker re open Committee strategy and issues (.5).
B190	07/17/24	C. Lee	1.20	Research legal issues re extension of automatic stay (1.2).



LaVie Care Centers, LLC

Client: 120098  
Invoice: 3939913  
Invoice Date: 09/30/24

Task	Date	Name	Hours	Description
B190	07/17/24	D. Simon	1.50	Conference with investigation team re next steps (.6); review materials re adversary (.5); conferences with J. Watson re various legal and regulatory issues (.4).
B190	07/18/24	C. Lee	1.70	Research legal issues re extension of automatic stay (1.6); correspond with D. Simon, MWE team re same (.1).
B190	07/18/24	E. Keil	4.00	Conferences with B. Jones, R. Ahmed, et al. re UCC issues (2.1); revise responses re same (.8); revise 9019 settlement motion (1.1).
B190	07/18/24	D. Simon	0.60	Conferences with MWE, J. Decker and Chapman re investigation (.6).
B190	07/19/24	C. Lee	2.50	Review and analyze response to stay extension motion (1.1); research and review precedent replies re same (1.4).
B190	07/19/24	D. Northrop	0.20	Review Recovery Corp.'s response in opposition to injunction motion filed in Adv. Pro. 24-5127 (.1); correspondence with MWE team re same (.1).
B190	07/19/24	D. Simon	2.00	Discussions with N. Bull and J. Haims re investigation and litigation issues (.8); review adversary response and strategize re same (1.2).
B190	07/19/24	E. Keil	4.20	Conference with J. Decker, B. Jones, et al. re status update (1.0); conference with J. Adams re MORs issues (.3); conference with R. Ahmed re same (.4); conference re 9019 motion with J. Watson, B. Jones, et al. (.4); correspondence with L. Aiken, F. Lawall, et al. re same (.3); revise same (.4); review objection filed in adversary (1.4).
B190	07/20/24	E. Keil	1.80	Prepare for and conference with N. Bull, C. Lee, et al. re reply in support of stay motion (1.1); review opposition re same (.7).
B190	07/20/24	C. Lee	9.40	Draft reply re extension of automatic stay (5.4); research and analyze case law, precedent re same (3.5); conference with E. Keil, MWE team re same (.5).
B190	07/20/24	D. Simon	1.60	Internal conferences re adversary response (1.0); review and analyze issues relating to same (.6).
B190	07/21/24	E. Keil	6.30	Revise reply re Recovery Corp. opposition (4.5); research re same (1.8).
B190	07/21/24	C. Lee	1.00	Draft demonstrative re automatic stay hearing (.7);



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LaVie Care Centers, LLC

Client: 120098  
Invoice: 3939913  
Invoice Date: 09/30/24

Task	Date	Name	Hours	Description
				research precedent re same (.2); correspond with D. Simon, MWE team re same (.1).
B190	07/21/24	D. Simon	1.00	Conference with B. Jones and R. Perry re adversary response and strategy (1.0).
B190	07/22/24	C. Lee	9.10	Review and revise reply in support of stay extension (2.4); research and analyze case law re same (3.6); correspond with E. Keil, MWE team re same (.5); prepare materials for hearing re same (1.4); review and analyze answer (1.2).
B190	07/22/24	D. Simon	3.40	Conferences with Ankura re adversary hearing prep (1.8); revisions to response (1.2); communications with N. Bull and J. Anthony re hearing prep and stip (1.4).
B190	07/22/24	E. Keil	5.60	Revise reply re adversary proceeding (3.2); conference with D. Simon re same (.5); conference with C. Lee re same (.6); prepare data room responses (1.3).
B190	07/23/24	C. Lee	1.40	Review and revise reply re automatic stay extension (1.1); correspond with E. Keil, MWE team re same (.3).
B190	07/23/24	D. Simon	4.50	Numerous conferences and emails re adversary prep (1.3); conferences with N. Bull and B. Jones re same (2.0); revisions to adversary response (.8); conference with K. Shapiro re tort claims (.4).
B190	07/23/24	E. Keil	6.40	Revise reply to objection in adversary proceeding (2.3); draft disclosures re Dias & Associates (4.1).
B190	07/24/24	C. Lee	0.60	Correspond with E. Keil, MWE team re adversary briefing (.2); research case law re same (.4).
B190	07/24/24	E. Keil	7.60	Research re stay extension motion (1.5); revise order re same, per court request (.9); revise 9019 motion re note settlement (.5); prepare responses for UCC data requests and upload same (4.7).
B190	07/24/24	D. Simon	2.20	Multiple conferences with DIP lenders, Omega, and Synergy re strategy and litigation matters (1.3); conference with J. Decker and B. Jones re same (.6); conference with N. Bull re same (.3).
B190	07/25/24	D. Simon	2.50	Attend Synergy presentation (1.5); revisions to Dias disclosure documents (.8); communications with Committee re FTI retention (.2).
B190	07/25/24	E. Keil	3.00	Revise stay extension order, pursuant to court



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LaVie Care Centers, LLC

Client: 120098  
Invoice: 3939913  
Invoice Date: 09/30/24

Task	Date	Name	Hours	Description
				request (.4); correspondence with K. Ussery, J. Watson re UCC requests (.3); conference with J. Watson re discovery requests, 9019 motion (.8); correspondence with UCC re discovery requests (.2); prepare responses re same (1.3).
B190	07/26/24	D. Simon	0.50	Review and revise Dias disclosures (.5).
B190	07/26/24	E. Keil	3.30	Revise Dias declaration (1.3); conference with J. Watson re 9019 motion (.1); correspondence with UCC re data room requests (.2); prepare and compile responses re same (.5); correspondence with K. Ussery re same (.2); review 2004 motion (.8); correspondence with D. Simon, B. Jones, et al. re same (.2).
B190	07/26/24	D. Northrop	0.20	Review Committee's motion for Rule 2004 examinations (.1); correspondence with MWE team re same (.1).
B190	07/28/24	D. Simon	0.40	Communications with DIP lenders re 2004 motion (.4).
B190	07/29/24	C. Lee	5.80	Research legal issues re 2004 requests (5.2); summarize findings re same (.4); correspond with E. Keil, MWE team re same (.2).
B190	07/29/24	E. Keil	9.20	Conference with D. Simon re 2004 motion (.2); conference with MWE litigation team re discovery requests (.9); conference with J. Muenker, L. Aiken, et al. re 2004 motion (.9); draft objection re same (5.6); conference with D. Simon re same (.3); review and compile responses to UCC discovery (1.1); correspondence with Troutman re same (.2).
B190	07/29/24	D. Simon	4.10	Participate in conference with Synergy re email production and related issues (1.0); conference with DIP lenders re 2004 requests (.6); conferences and communications re 2004 objection (1.3); review and analyze 2004 requests and related law (1.2).
B190	07/29/24	J. Haake	0.30	Correspondence with E. Keil re discovery issues (.3).
B190	07/30/24	C. Lee	3.20	Research legal issues re 2004 objection (2.9); correspond with E. Keil, MWE team re same (.3).
B190	07/30/24	E. Keil	13.80	Revise objection to 2004 motion (4.3); research re same (2.8); conferences with D. Simon, N. Bull re same (.8); conference with T. Cramton, N. Bull re





LaVie Care Centers, LLC

Client: 120098  
Invoice: 3939913  
Invoice Date: 09/30/24

Task	Date	Name	Hours	Description
				2004 requests (1.3); conference with F. Lawall, D. Kovsky, et al. re same (1.0); correspondence with D. Simon, N. Bull re same (.5); conference with J. Adams re same (.3); conference with D. Dias, C. Bryson re disclosures (1.0); conference with D. Simon re same (.1); revise same (.8); prepare and compile responses to UCC discovery (.9).
B190	07/30/24	D. Simon	9.70	Numerous communications re 2004 objection with N. Bull and E. Keil (2.4); numerous revisions and drafting of same (2.0); attend meet and confer with Committee (1.0); prepare for 2004 hearing (2.1); conferences with DIP lenders re same (.7); conference with J. Adams re same (.3); attend investigation meeting (.6); conference with C. Bryson and D. Dias re Dias disclosures (.6).
B190	07/31/24	E. Keil	1.30	Finalize 2004 objection for filing (.4); correspondence with D. Northrop re filing of same (.1); conference with litigation team re discovery update (.4); conferences with D. Simon, N. Bull re 2004 motion (.4).
B190	07/31/24	D. Simon	1.20	Conferences with N. Bull and J. Muenker re contested workstreams (1.2).
B195	07/22/24	N. Bull	2.50	Travel from Miami to Atlanta for hearing (travel time reduced by 50%) (2.5).
B195	07/24/24	N. Bull	2.80	Travel from Atlanta to Miami (travel time reduced by 50%) (2.8).
B210	07/01/24	D. Simon	1.00	Conference with client re check-in and open issues (.4); conferences with B. Jones re open operational questions and issues (.6).
B210	07/02/24	E. Keil	0.30	Conference with J. Brilliant re schedules and statements (.3).
B210	07/02/24	D. Simon	0.30	Communications re CMPs and cost report settlements (.3).
B210	07/03/24	D. Simon	1.90	Multiple conferences with Ankura re provider tax and CMP issues (1.3); multiple communications with Ankura and Synergy re same (.6).
B210	07/05/24	D. Simon	0.40	Multiple conferences with various creditors re operational issues (.4).
B210	07/06/24	D. Northrop	0.20	Review US Trustee's notices of appointment patient care ombudsman (.1); correspondence with MWE





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LaVie Care Centers, LLC

Client: 120098  
Invoice: 3939913  
Invoice Date: 09/30/24

Task	Date	Name	Hours	Description
				team re same (.1).
B210	07/08/24	D. Simon	1.60	Conference with Synergy re Committee diligence issues (1.0); check-in conference with client (.3); conference with Harts Harbor landlord (.3).
B210	07/09/24	D. Northrop	0.20	Communications with E. Keil re preparations for finalizing and filing Debtors' schedules of assets and liabilities and statements of financial affairs on or before the 7.16.24 deadline (.2).
B210	07/09/24	D. Simon	5.50	Multiple conferences with Committee re revisions to second-days and second-day diligence (1.4); multiple conferences and communications with Ankura and internal re same (2.2); conference with L. Harperin and B. Jones re case strategy (.3); conferences with Synergy re open litigation and operational matters (1.1); conference with Ankura re schedules and statements (.5).
B210	07/09/24	E. Keil	1.60	Conference with A. Dalsass, J. Brilliant, et al. re schedules and statements (.7); revise global notes re same (.5); conference with J. Watson, D. Simon, et al. re survey issues (.4).
B210	07/10/24	E. Keil	2.70	Conference with A. Dalsass, J. Brilliant, et al. re schedules and statements (1.6); revise global notes re same (1.1).
B210	07/10/24	D. Simon	0.50	Conference with L. Aiken re lease discussions (.2); review sale and performance issues (.3).
B210	07/11/24	E. Keil	0.90	Revise global notes re schedules and statements (.8); conference with KCC re same (.1).
B210	07/11/24	D. Simon	0.60	Conferences with J. Decker and B. Jones re case strategy (.6).
B210	07/12/24	E. Keil	4.60	Revise global notes re schedules and statements (1.2); correspondence with Ankura team re same (.3); review schedules and statements (3.1).
B210	07/13/24	E. Keil	0.70	Conference with A. Dalsass, J. Brilliant, et al. re schedules and statements (.7).
B210	07/14/24	E. Keil	3.70	Conference with B. Jones, A. Dalsass, G. Hayes, et al. re schedules and statements (3.1); revise global notes re same (.6).
B210	07/15/24	J. Haake	0.40	Prepare for and participate in conference with B. Jones, M. Krakovsky, E. Keil, and D. Simon re strategy and status of case (.4).



LaVie Care Centers, LLC

Client: 120098  
Invoice: 3939913  
Invoice Date: 09/30/24

Task	Date	Name	Hours	Description
B210	07/15/24	E. Keil	1.70	Conference with B. Jones, J. Decker, et al. re status update (.4); prepare for schedules and statements filing (1.3).
B210	07/15/24	D. Simon	1.50	Conferences with client re open business issues (1.2); conferences with Committee re same (.3).
B210	07/16/24	E. Song	6.50	Review instructions re schedules and statements of financial affairs and file the same (6.5).
B210	07/16/24	N. Rainey	12.90	Electronically file schedules of assets and liabilities for 59 Debtor entities (7.8); electronically file statement of financial affairs for 59 Debtor entities (4.1); multiple emails with E. Keil re same (.6); email and conference with D. Northrop to discuss filing logistics re same (.4).
B210	07/16/24	D. Northrop	13.30	Correspondence with MWE team re preparations for and timing of commencement of filing of Debtors' schedules and statements (.1); conference with N. Rainey re issue relating to filing of Debtors' schedules (.1); draft correspondence to E. Keil re issue relating to the filing of Debtors' schedules of assets and liabilities (.3); revise and update ECF filing instructions for schedules of assets and liabilities (.4); file schedules of assets and liabilities and statements of financial affairs on the respective ECF case dockets for 57 Debtor entities (12.4).
B210	07/16/24	E. Keil	9.70	Prepare schedules and statements for filing (4.1); conference with A. Dalsass re same (.3); correspondence with paralegal team re same (1.4); conferences with B. Jones, A. Dalsass, et al. re same (2.7); conference with B. Jones, D. Simon re same (.3); review filed versions of same (.9).
B210	07/16/24	A. Squillante	6.80	File schedules and statements (6.8).
B210	07/16/24	J. Bishop Jones	6.50	Multiple communications with MWE re filing schedules and statements (.5); prepare documents for filing (.3); file schedule and statements for 58 Debtor affiliates (5.7).
B210	07/17/24	E. Keil	0.40	Correspondence with J. Adams re MORs, UST fees (.4).
B210	07/17/24	A. Squillante	1.00	File schedules and statements (1.0).
B210	07/18/24	J. Haake	0.50	Correspondence with notice parties re cash management issues and conference with R. Ahmed



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LaVie Care Centers, LLC

Client: 120098  
Invoice: 3939913  
Invoice Date: 09/30/24

Task	Date	Name	Hours	Description
				re same (.5).
B210	07/18/24	E. Keil	1.10	Correspondence with R. Ahmed, J. Adams re MOR issues (.6); research re same (.5).
B210	07/19/24	D. Northrop	0.10	Review US Trustee's notice of appointment of patient care ombudsman and correspondence with MWE team re same (.1).
B210	07/19/24	D. Simon	2.70	Conference with B. Jones, L. Halperin and J. Decker re open Committee issues (1.0); multiple conferences with Synergy re open operational issues and strategy issues (1.4); communications with Committee re same (.3).
B210	07/22/24	D. Simon	1.00	Conferences with Synergy team re management fees and related issues (1.0).
B210	07/22/24	E. Keil	2.10	Conference with C. Bryson, G. Hayes, et al. re status update (1.0); correspondence with same re same (.3); conference with Ankura, KCC re Schedule G amendments (.8).
B210	07/24/24	J. Jumbeck	0.40	Correspondence with M. Carryl (CIBC) re cash management order (.2); review cash management motion (.2).
B210	07/25/24	N. Rainey	0.20	Communications with E. Keil, D. Northrop and J. Bishop-Jones re upcoming filing of amended Schedule G (.2).
B210	07/25/24	D. Northrop	0.20	Correspondence with E. Keil re issues relating to and timetable for filing amended Schedule G for 236 Debtor entities (.2).
B210	07/25/24	E. Keil	1.20	Conference with A. Dalsass, J. Brilliant, et al. re MORs (.7); conference with same re Schedule G amendments (.5).
B210	07/26/24	E. Keil	0.30	Conferences with KCC re Schedule G amendments (.3).
B210	07/29/24	E. Keil	0.90	Conference with J. Decker, B. Jones, et al. re status update (.5); conference with J. Brilliant re MORs (.1); correspondence with J. Watson re service of notices (.3).
B210	07/29/24	J. Haake	0.60	Prepare for and participate in conference with Ankura team and E. Keil re status of case, sale process, and strategy (.6).
B210	07/29/24	D. Simon	0.30	Participate in conference with client re status update (.3).



**McDermott  
Will & Emery**

LaVie Care Centers, LLC

Client: 120098  
Invoice: 3939913  
Invoice Date: 09/30/24

Task	Date	Name	Hours	Description
B210	07/30/24	J. Jumbeck	0.70	Conference with D. Simon re case status (.2); conference with PR and VP teams re same (.3); correspondence with MWE team re same (.2).
B210	07/30/24	J. Haake	0.30	Correspondence with E. Keil re administrative issues (.2); correspondence with D. Northrop re administrative issues (.1).
B210	07/31/24	E. Keil	2.90	Conference with J. Adams re MORs (.1); conferences with J. Brilliant re same (.2); review same and supporting schedules (2.2); conference with D. Northrop re filing of same (.2); correspondence with R. Dowdy re same (.2).
B210	07/31/24	L. Foody	1.20	Review correspondence from ordinary course professional (.2); conference with professional re same (.3); conference with E. Keil re same (.7).
B210	07/31/24	D. Northrop	1.60	Review three (3) consolidated MORs to be filed on the docket of the main case (.3); prepare to file consolidated MORs, including review of steps in the ECF filing procedure for MORs (.2); conference with E. Keil re properly reflecting in the docket entries the case numbers of all Debtor entities covered by each consolidated MOR (.2); file three (3) consolidated MORs on the ECF case docket (.9).
B230	07/05/24	E. Keil	2.10	Conference with R. Ahmed, B. Jones, et al. re UCC DIP budget questions (.8); conference with F. Lawall, B. Jones, et al. re same (1.3).
B240	07/16/24	G. Karch	0.70	Review analysis of tax issues in preparation for conference (.7).
B240	07/18/24	M. Wilder	0.50	Prepare for and conference with G. Karch re mitigating COD income (.5).
B240	07/18/24	G. Karch	2.10	Conference with D. Snyder, B. Baron, D. Simon, et al. re tax issues (1.2); analyze tax issues (.6); conference with M. Wilder re same (.3).
B240	07/25/24	M. Wilder	0.50	Conference re COD income with G. Karch (.5).
B270	07/03/24	J. Haake	0.30	Correspondence with A. Dalsass and S. Palumbo re utilities issues (.3).
B270	07/05/24	J. Haake	0.20	Correspondence with J. Brilliant re utilities issues and adequate assurance (.2).
B270	07/08/24	J. Haake	0.20	Correspondence with S. Palumbo re utilities issues (.2).
B270	07/10/24	C. Lee	0.50	Correspond with utility, E. Keil, and Ankura team re



**McDermott  
Will & Emery**

LaVie Care Centers, LLC

Client: 120098  
Invoice: 3939913  
Invoice Date: 09/30/24

Task	Date	Name	Hours	Description
				utility payment inquiry (.2); review utilities order, diligence information re same (.3).
B270	07/10/24	J. Haake	0.20	Correspondence with S. Palumbo re utilities (.2).
B270	07/12/24	C. Lee	0.20	Correspond with Ankura team, utilities counsel re utility payments (.2).
B270	07/15/24	J. Haake	0.60	Correspondence with R. Johnson and R. Ahmed re utility issues (.6).
B270	07/29/24	C. Lee	0.10	Correspond with Ankura team re utilities inquiry (.1).
B270	07/30/24	C. Lee	0.10	Correspond with Ankura team, counsel to utility provider re utilities payments (.1).
B280	07/11/24	E. Keil	0.40	Correspondence with UHC, Third Wave re recoupment (.4).
B280	07/12/24	E. Keil	0.80	Conference with UHC re recoupment (.3); conference with Third Wave re same (.5).
B280	07/12/24	D. Simon	1.70	Conference with Third Wave re automatic stay (.5); conference with United Healthcare re same (.5); prepare for foregoing (.7).
B280	07/15/24	J. Haake	3.50	Conference and correspondence with L. Wolgast re CFS dispute and settlement discussions (1.3); revise draft stipulation and agreed order with CFS (1.2); correspondence with E. Keil re stipulated order (.2); correspondence and conferences with S. Brazill re negotiations with CFS (.5); correspondence with D. Simon and J. Watson re CFS operational issues (.3).
B280	07/15/24	E. Keil	1.10	Conference with B. Jones, G. Hayes, et al. re vendor matters (1.1).
B280	07/19/24	J. Haake	0.80	Correspondence with S. Brazill and J. Pyron re vendor issues (.8).
B280	07/23/24	J. Haake	0.70	Review information from United Healthcare and correspondence with K. Ussery re same (.7).
B280	07/29/24	J. Haake	0.70	Conference and correspondence with R. Jurbala re vendor issue (.4); analysis of vendor issue (.3).
B280	07/30/24	J. Haake	0.30	Correspondence with L. Williams re vendor and administrative issues (.3).
B290	07/09/24	C. Lee	1.20	Draft stipulation re Chubb consolidated claim (.9); review and analyze precedent re same (.2); correspond with E. Keil re same (.1).
B290	07/09/24	D. Northrop	0.40	File notice of filing of modified proposed final insurance order on the ECF case docket (.2); re-



LaVie Care Centers, LLC

Client: 120098  
Invoice: 3939913  
Invoice Date: 09/30/24

Task	Date	Name	Hours	Description
				format modified proposed final insurance order to comply with the court's upload requirement (.1); upload modified proposed final insurance order via the order upload function in ECF (.1).
B290	07/18/24	J. Haake	1.00	Prepare for and participate in conference with J. Horowitz re insurance issues (.4); revise draft Client Service Agreement (.5); correspondence with D. Simon and B. Jones re same (.1).
B290	07/23/24	D. Simon	0.40	Conferences with D. Thomas re insurance issues (.4).
B290	07/24/24	J. Haake	1.50	Review analysis of insurance issues and correspondence with K. Ussery re same (.6); correspondence with L. Williams re insurance issue (.3); correspondence with A. Dalsass re same (.2); conference with L. Williams re insurance issues (.4).
B290	07/31/24	J. Haake	1.60	Correspondence with CAC re insurance issues (.4); prepare for and participate in conference with D. Simon re same (.8); conference with J. Brilliant re insurance and banking issues (.4).
B310	07/01/24	C. Lee	0.80	Review and revise bar date motion (.5); correspond with D. Simon, MWE team re same (.2); correspond with KCC team re service of same (.1).
B310	07/01/24	E. Keil	2.40	Revise bar date motion and order (1.4); correspondence with D. Northrop, D. Simon re same (.3); revise publication notice (.4); correspondence with A. Levin re same (.3).
B310	07/01/24	D. Northrop	0.70	Review draft of Debtors' motion for entry of order establishing bar dates (.2); correspondence with E. Keil re local rule requirements and proposed revisions to bar date motion (.1); file bar date motion (.2); review proposed order establishing bar dates for filing claims and correspondence with E. Keil re same (.1); upload proposed bar date order (.1).
B310	07/02/24	E. Keil	0.40	Correspondence with A. Levin re publication notices (.3); correspondence with D. Simon re same (.1).
B310	07/02/24	D. Northrop	0.20	Review bar date order entered on 7/2/2024 (.1); correspondence with MWE team re same (.1).
B310	07/03/24	E. Keil	0.50	Correspondence with A. Levin re FL publications (.5).
B310	07/05/24	C. Lee	0.10	Correspond with E. Keil re Chubb claim stipulation





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LaVie Care Centers, LLC

Client: 120098  
Invoice: 3939913  
Invoice Date: 09/30/24

Task	Date	Name	Hours	Description
				(.1).
B310	07/08/24	E. Keil	5.80	Revise global notes re schedules and statements (3.1); review drafts of same (2.7).
B310	07/08/24	J. Haake	0.30	Review notice of publication and correspondence with E. Keil re same (.3).
B310	07/08/24	D. Simon	0.30	Correspondence with Committee and internally re bar date issues (.3).
B310	07/09/24	D. Northrop	0.20	Draft notice of filing for affidavit of publication of notice of bar dates for filing claims in the New York Times (.2).
B310	07/09/24	E. Keil	0.40	Revise affidavit of publication notice (.2); correspondence with J. Watson re notice of commencement (.2).
B310	07/10/24	C. Lee	0.10	Correspond with Chubb re claims stipulation (.1).
B310	07/10/24	D. Northrop	0.30	Finalize notice of filing of affidavit of publication of notice of bar dates for filing proofs of claim (.1); file same (.2).
B310	07/11/24	C. Lee	0.50	Correspond with E. Keil re Chubb claim stipulation (.1); conference with Chubb re same (.4).
B310	07/11/24	E. Keil	0.40	Correspondence with C. Lee re POC stipulation (.3); correspondence with D. Simon re same (.1).
B310	07/12/24	C. Lee	0.10	Correspond with Chubb re claims stipulation (.1).
B310	07/16/24	D. Simon	2.20	Numerous conferences with MWE and Ankura teams and review/comment of schedules and statements (2.2).
B310	07/17/24	D. Northrop	0.40	Review affidavits of publication of notice of bar dates (.1); draft notice of filing for affidavits of publication of notice of bar dates (.3).
B320	07/01/24	J. Jumbeck	2.50	Continue to review current draft of combined plan and disclosure statement (.8); research re precedent re same (1.7).
B320	07/02/24	J. Jumbeck	2.20	Continue to draft combined disclosure statement and plan (2.2).
B320	07/03/24	D. Simon	0.60	Review plan and discussions with J. Jumbeck re same (.6).
B320	07/07/24	J. Jumbeck	3.10	Continue to draft combined disclosure statement and plan (2.3); review precedent re same (.8).
B320	07/08/24	R. Trickey	0.30	Correspond with claims agent team re solicitation procedures (.3).
B320	07/08/24	J. Jumbeck	6.80	Continue to draft combined plan and disclosure





**McDermott  
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LaVie Care Centers, LLC

Client: 120098  
Invoice: 3939913  
Invoice Date: 09/30/24

Task	Date	Name	Hours	Description
				statement (6.8).
B320	07/09/24	J. Jumbeck	8.80	Continue to draft and revise combined disclosure statement and plan (8.8).
B320	07/10/24	J. Jumbeck	5.80	Conference with D. Simon and E. Keil re draft disclosure statement and plan (.8); incorporate feedback re same (3.2); revise same (1.8).
B320	07/10/24	E. Keil	1.40	Conference with J. Jumbeck, D. Simon re plan and disclosure statement (1.4).
B320	07/10/24	D. Simon	1.30	Review plan/DS (.8); conference with E. Keil and J. Jumbeck re same (.5).
B320	07/10/24	L. Foody	1.90	Revise disclosure statement background section (1.9).
B320	07/11/24	J. Jumbeck	5.10	Continue to revise draft combined disclosure statement and plan (3.4); review D. Simon's comments re same (1.1); incorporate same (.6).
B320	07/11/24	D. Simon	1.60	Review and comment on plan (1.6).
B320	07/12/24	J. Jumbeck	5.40	Review D. Simon's comments to draft disclosure statement and plan (.8); revise same (3.2); review additional D. Simon's comments re same (.3); revise same (.9); correspondence with DIP lender team re same (.1); correspondence with MidCap team re same (.1).
B320	07/12/24	D. Simon	1.70	Revise plan and related materials (1.3); conference with J. Jumbeck re same (.4).
B320	07/15/24	R. Trickey	1.80	Revise solicitation motion and ancillary documents (1.7); correspond with J. Jumbeck and J. Haake re same (.1).
B320	07/15/24	J. Jumbeck	6.10	Review E. Keil's comments to plan (.7); incorporate same (1.0); review draft of solicitation procedures motion (1.1); revise same (.6); review confirmation hearing notice (.4); revise same (.3); review form of ballot (.6); revise same (.4); review form of non-voting notice (.4); revise same (.3); correspondence with MWE team re same (.3).
B320	07/15/24	J. Haake	2.00	Analysis of plan timeline issue and conference with J. Jumbeck re same (.8); correspondence with R. Trickey re plan solicitation issues (.7); correspondence with Verita re solicitation and service issues (.5).
B320	07/15/24	E. Keil	3.20	Revise plan and disclosure statement (3.2).



LaVie Care Centers, LLC

Client: 120098  
Invoice: 3939913  
Invoice Date: 09/30/24

Task	Date	Name	Hours	Description
B320	07/15/24	D. Simon	1.00	Revise plan and related documents (1.0).
B320	07/16/24	R. Trickey	0.30	Revise solicitation procedures (.3).
B320	07/16/24	J. Jumbeck	1.40	Review PR comments to draft disclosure statement and plan (.7); incorporate same (.4); correspondence with PR team re same (.1); correspondence with MWE team re same (.2).
B320	07/16/24	L. Foody	0.50	Update disclosure statement background section (.5).
B320	07/17/24	R. Trickey	1.30	Revise solicitation motion and ancillary materials (1.2); correspond with J. Haake and J. Jumbeck re same (.1).
B320	07/17/24	J. Jumbeck	5.80	Conference with GP team, DLA team, FBFK team, and D. Simon re draft of disclosure statement and plan (.7); review draft notice of plan supplement (.6); revise same (.4); review draft notice of confirmation hearing (.5); revise same (.4); review draft tabulation procedures (.8); revise same (.6); review draft solicitation cover letter (.3); revise same (.2); review D. Simon's comments to plan (.2); revise same (.8); correspondence with MWE team re same (.3).
B320	07/17/24	D. Simon	2.30	Conference with Committee re plan and related issues (.8); multiple conferences with DIP lenders re plan issues (1.5).
B320	07/18/24	R. Trickey	0.20	Review comments re solicitation motion (.2).
B320	07/18/24	J. Haake	0.90	Review plan time line and correspondence with Verita and E. Keil re same (.5); conference with R. Ahmed re plan strategy and timing issues (.4).
B320	07/18/24	J. Jumbeck	4.00	Continue to revise solicitation motion draft and exhibits (3.2); correspondence with MWE team re same (.5); correspondence with Goodwin team re same (.3).
B320	07/18/24	E. Keil	1.00	Correspondence with J. Haake, R. Trickey re solicitation procedures (.3); review same (.7).
B320	07/18/24	D. Simon	1.30	Communications re plan revisions (.8); conferences with DIP lenders re same (.5).
B320	07/19/24	R. Trickey	0.30	Conference with J. Haake re solicitation motion revisions (.3).
B320	07/19/24	J. Haake	1.40	Conferences and correspondence with R. Trickey re solicitation procedures (1.2); correspondence with J.



LaVie Care Centers, LLC

Client: 120098  
Invoice: 3939913  
Invoice Date: 09/30/24

Task	Date	Name	Hours	Description
B320	07/19/24	D. Simon	0.50	Jumbeck and R. Trickey re plan timeline (.2). Conferences with J. Muenker and Omega re plan strategy and related issues (.5).
B320	07/19/24	E. Keil	1.60	Review and revise solicitation procedures motion (1.3); correspondence with R. Trickey re same (.3).
B320	07/20/24	R. Trickey	2.90	Revise solicitation motion (2.9).
B320	07/21/24	R. Trickey	5.20	Conference with J. Haake re solicitation motion revision (.3); revise solicitation motion (4.9).
B320	07/21/24	J. Haake	2.60	Revise solicitation motion and related materials (2.3); conferences with R. Trickey re same (.3).
B320	07/22/24	R. Trickey	5.00	Conference with J. Haake and J. Jumbeck re combined plan and disclosure statement, and solicitation motion (.3); revise solicitation motion and ancillary documents (4.0); revise combined plan and disclosure statement (.7).
B320	07/22/24	J. Jumbeck	5.10	Review Goodwin comments to draft disclosure statement and plan (1.3); review PR comments re same (.6); conference with D. Simon re Goodwin comments to draft disclosure statement and plan (.5); revise same (1.5); correspondence with Goodwin team re same (.4); correspondence with MWE team re same (.4); correspondence with LaVie team re same (.1); correspondence with PR/VP teams re same (.3).
B320	07/22/24	J. Haake	5.40	Review and revise solicitation motion and related documents in anticipation of finalizing and filing same (2.5); correspondence with J. Jumbeck re solicitation procedures (.2); revise plan to incorporate updated solicitation information (1.0); conferences with R. Trickey and S. Reitzel re solicitation issues, and revise ballots to incorporate comments (1.4); correspondence with E. Keil re solicitation motion (.3).
B320	07/22/24	D. Simon	1.30	Numerous conferences and communications with MWE team re plan filing and revisions thereto (1.3).
B320	07/23/24	J. Haake	3.20	Revise ballots to incorporate comments received from various parties and revisions to combined plan and disclosure statement (1.8); analysis of revisions and correspondence with D. Simon and J. Jumbeck re same (.6); revise combined plan to incorporate



LaVie Care Centers, LLC

Client: 120098  
Invoice: 3939913  
Invoice Date: 09/30/24

Task	Date	Name	Hours	Description
				revisions and correspondence with J. Jumbeck re same (.8).
B320	07/23/24	R. Trickey	0.40	Conference with J. Haake re solicitation procedures motion (.2); correspond with S. Reitzel re same (.2).
B320	07/23/24	J. Jumbeck	6.90	Conference with GP and FBFK teams re draft disclosure statement and plan (.5); conference with D. Simon re same (.2); revise same (2.1); review MWE comments re same (.4); correspondence with J. Haake re same (.4); correspondence with MWE team re same (.6); correspondence with GP, DLA, and FBFK teams re same (.7); correspondence with VP and PR teams re same (.4); revise draft disclosure statement and plan (1.4); prepare filing version re same (.2).
B320	07/23/24	D. Simon	2.50	Multiple conferences with DIP lenders re plan (1.4); conferences with J. Jumbeck re same (.5); revisions to same (.6).
B320	07/24/24	J. Jumbeck	0.20	Correspondence with PR team re draft of disclosure statement and plan (.1); correspondence with GP team re same (.1).
B320	07/29/24	D. Simon	1.00	Conference with J. Decker, B. Jones and L. Halperin re plan negotiation issues (1.0).
B320	07/31/24	D. Simon	0.30	Review term sheet (.3).
B430	07/01/24	J. Haims	4.00	Conference with MWE team re UCC investigation and meeting with UCC counsel (1.0); review and revise draft interview outline (1.0); legal research re investigation framework (1.0); correspondence re investigation, additional interviews, document collection and review, privilege issues, and strategy (1.0).
B430	07/01/24	H. Udow	2.60	Revise informal interview questions (1.2); conference with J. Haims re same (.4); review UCC opposition to DIP loan (1.0).
B430	07/01/24	N. Fomba	7.00	Research re [REDACTED] (7.0).
B430	07/02/24	J. Haims	3.00	Prepare for and participate in meeting with Synergy counsel re investigation (2.0); multiple correspondence with MWE team re investigation, additional interviews, document collection and review, privilege issues, and strategy (1.0).



LaVie Care Centers, LLC

Client: 120098  
Invoice: 3939913  
Invoice Date: 09/30/24

Task	Date	Name	Hours	Description
B430	07/02/24	L. Barrett	2.60	Research re [REDACTED] (1.6); draft presentation re same (1.0).
B430	07/02/24	H. Udow	0.70	Conference with J. Muenker, J. Haims, Chapman re informal interviews (.7).
B430	07/03/24	J. Haims	3.00	Correspondence with MWE team re investigation, additional interviews, document collection and review, privilege issues, and strategy (1.0); revise draft investigation report and correspondence re same (1.0); research re [REDACTED] (1.0).
B430	07/03/24	L. Barrett	0.50	Prepare for and participate in conference with MWE team re investigation (.5).
B430	07/03/24	N. Fomba	4.20	Review and update legal analysis presentation (1.0); revise [REDACTED] research (2.5); conference with J. Haims re presentation and edits (.7).
B430	07/03/24	C. Zhu	0.40	Participate in weekly MWE update meeting re investigation (.2); review and analyze interview questions (.2).
B430	07/05/24	J. Haims	2.00	Draft investigation report and correspondence re same (1.0); research re investigation report (1.0).
B430	07/05/24	L. Barrett	1.60	Research re [REDACTED] (.3); draft presentation re same (1.3).
B430	07/06/24	J. Haims	0.50	Correspondence with MWE team re investigation, document collection and review, and strategy (.5).
B430	07/07/24	J. Haims	0.50	Correspondence with MWE team re investigation, document collection and review, and strategy (.5).
B430	07/08/24	N. Fomba	3.00	Review of Debtor documents and additional research into [REDACTED] claims (3.0).
B430	07/08/24	J. Haims	2.50	Correspondence with MWE team re investigation, document collection, review, and strategy (2.0); legal research re investigation report (.5).
B430	07/08/24	C. Zhu	2.30	Review and analyze interview memos and communications from J. Muenker (2.3).
B430	07/08/24	H. Udow	0.60	Review confidentiality and non-disclosure agreement (.6).
B430	07/09/24	J. Haims	2.00	Correspondence with MWE team re investigation, document collection and review, and strategy (2.0).
B430	07/09/24	L. Barrett	0.30	Draft presentation re fraudulent transfer (.3).
B430	07/10/24	J. Haims	2.00	Correspondence with MWE team re investigation, document collection and review, and strategy (2.0).



LaVie Care Centers, LLC

Client: 120098  
Invoice: 3939913  
Invoice Date: 09/30/24

Task	Date	Name	Hours	Description
B430	07/10/24	H. Udow	0.30	Participate in meeting with MWE team re status update (.3).
B430	07/10/24	L. Barrett	2.40	Participate in conference with MWE litigation team re case status (.3); review and revise presentation re fraudulent transfer (2.1).
B430	07/10/24	C. Zhu	0.30	Participate in weekly MWE internal meeting (.3).
B430	07/10/24	N. Fomba	2.50	Participate in weekly conference with case team (.5); review of [REDACTED] research and correspond with L. Barrett re same (2.0).
B430	07/11/24	J. Haims	1.50	Correspondence with MWE team re investigation, draft NDA, document collection and review, and strategy (.5); research re potential claims (1.0).
B430	07/12/24	J. Haims	0.50	Correspondence with MWE team re claims analysis and strategy (.5).
B430	07/15/24	J. Haims	1.00	Correspondence with MWE team re claims analysis and strategy (1.0).
B430	07/16/24	J. Haims	3.00	Correspondence with MWE team re claims analysis, Committee investigation, and strategy (1.0); prepare for and participate in conference with Ankura re same (2.0).
B430	07/16/24	L. Barrett	1.30	Participate in investigation conference with MWE litigation team, FA, and Aligned counsel (1.3).
B430	07/16/24	H. Udow	3.30	Participate in conference with MWE team and Ankura re financial analysis (2.0); review financial analysis documents (1.3).
B430	07/16/24	C. Zhu	3.30	Review and analyze Ankura financial analysis (.7); review data room documents (1.1); participate in conference with Ankura re financial analysis (1.5).
B430	07/17/24	J. Haims	3.50	Multiple correspondence with MWE team re claims analysis, Committee investigation, and strategy (2.0); prepare for conference with Committee counsel (.5); draft presentation re claims and causes of action (1.0).
B430	07/17/24	H. Udow	1.00	Participate in MWE team conference and associated follow up (.6); revise factual sections of investigation summary (.4).
B430	07/17/24	C. Zhu	1.70	Participate in team update meeting (.6); review presentation and update Ankura finding slides (1.1).
B430	07/17/24	L. Barrett	0.70	Participate in conferences with MWE team re investigation, next steps (.7).





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LaVie Care Centers, LLC

Client: 120098  
Invoice: 3939913  
Invoice Date: 09/30/24

Task	Date	Name	Hours	Description
B430	07/17/24	N. Fomba	2.50	Participate in weekly team conference (.5); conference with investigation team re legal analysis presentation (.5); conference with H. Udow, C. Zhu and L. Barrett re presentation (.5); update presentation and circulate to team (1.0).
B430	07/18/24	J. Haims	3.00	Correspondence with MWE team re claims analysis, Committee investigation, and strategy (2.0); prepare for and participate in conference with DLA, and correspondence re same (1.0).
B430	07/18/24	H. Udow	1.30	Revise PowerPoint summarizing investigation (.9); conference with MWE, Chapman, and DLA Piper teams, and draft summary of same (.4).
B430	07/18/24	C. Zhu	1.80	Draft and revise slide deck (1.8).
B430	07/19/24	J. Haims	2.00	Correspondence with MWE team re claims analysis, Committee investigation, and strategy (1.0); prepare for and participate in conference with Committee counsel, and correspondence with MWE team re same (1.0).
B430	07/19/24	C. Zhu	0.90	Review and revise presentation slides (.2); participate in meeting with Troutman Pepper (.4); summarize notes re same (.3).
B430	07/19/24	N. Fomba	2.50	Correspond with team re investigation and legal analysis (.5); review documents and update presentation (2.0).
B430	07/20/24	J. Haims	0.50	Correspondence with MWE team re claims analysis, Committee investigation, and strategy (.5).
B430	07/21/24	J. Haims	1.00	Correspondence with MWE team re claims analysis, Committee investigation, and strategy (1.0).
B430	07/22/24	N. Fomba	7.40	Review and analyze legal analysis presentation and update slides (4.4); review and analyze legal research on [REDACTED] claims (3).
B430	07/22/24	J. Haims	1.50	Correspondence with MWE team re claims analysis, Committee investigation, and strategy (1.5).
B430	07/22/24	L. Barrett	1.60	Review and revise investigation presentation (1.4); correspond with MWE litigation team re same (.2).
B430	07/22/24	H. Udow	1.10	Revise investigation summary presentation (1.1).
B430	07/22/24	C. Zhu	0.70	Review and analyze meeting notes to revise slide deck (.7).
B430	07/23/24	J. Haims	1.50	Correspondence with MWE team re claims analysis,





LaVie Care Centers, LLC

Client: 120098  
Invoice: 3939913  
Invoice Date: 09/30/24

Task	Date	Name	Hours	Description
				Committee investigation, and strategy (1.0); review and revise draft presentation, and correspondence with MWE team re same (.5).
B430	07/24/24	J. Haims	1.50	Correspondence with MWE team re claims analysis, Committee investigation, and strategy (1.0); review and revise draft presentation, and correspondence with MWE team re same (.5).
B430	07/24/24	H. Udow	0.40	Conference with MWE team re next steps (.4).
B430	07/24/24	C. Zhu	1.00	Participate in MWE update conference (.4); revise presentation slides based on information discussed during the conference (.6).
B430	07/25/24	J. Haims	3.00	Correspondence with MWE team re claims analysis, Committee investigation, draft presentation, and strategy (1.0); prepare for and attend meeting with S. Bryson and Synergy counsel re same (2.0).
B430	07/25/24	C. Zhu	1.80	Participate in meeting on presentation of Debtors' background (1.8).
B430	07/26/24	J. Haims	0.50	Correspondence with MWE team re claims analysis, Synergy document production, and strategy (.5).
B430	07/29/24	J. Haims	1.50	Correspondence with MWE team re claims analysis, Committee investigation, draft presentation, Synergy document production, Committee discovery requests, and strategy (1.5).
B430	07/30/24	J. Haims	1.30	Correspondence with MWE team re claims analysis, Committee investigation, draft presentation, Synergy document production, Committee discovery requests, and strategy (1.3).
B430	07/30/24	C. Zhu	0.90	Participate in meeting with bankruptcy team, Ankura team, and J. Decker (.9).
B430	07/30/24	H. Udow	0.50	Conference with MWE and Chapman teams re investigation update (.5).
B430	07/30/24	N. Fomba	6.50	Review qui tam litigation docket filings and opinions at both the trial and appellate court levels (5.0); draft outline of key events (1.5).
B430	07/31/24	J. Haims	3.50	Correspondence with MWE team re claims analysis, Committee investigation, draft presentation, Synergy document production, Committee discovery requests, and strategy (2.0); draft presentation re same (1.5).
B430	07/31/24	L. Barrett	1.30	Participate in conference with MWE team re status



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LaVie Care Centers, LLC

Client: 120098  
Invoice: 3939913  
Invoice Date: 09/30/24

Task	Date	Name	Hours	Description
				(.4); participate in conference with MWE litigation team re investigation presentation (.5); review and revise investigation presentation (.4).
B430	07/31/24	H. Udow	1.00	Conference with MWE team re next steps (.4); conference with MWE investigation team re presentation (.6).
B430	07/31/24	C. Zhu	1.80	Participate in team meeting re next step and presentation slides, and review and revise presentation slides (1.8).
B430	07/31/24	N. Fomba	5.50	Participate in weekly MWE team conference (.5); conference with investigation team re legal analysis presentation (.5); review research on breach of [REDACTED] (4.5).
B470	07/01/24	N. Bull	2.00	Conferences and correspondence with MWE team, Committee and plaintiffs' counsel re discovery and adversary proceeding (2.0).
B470	07/02/24	N. Bull	2.00	Conferences and correspondence with D. Simon and plaintiffs' counsel re cases subject to stay (2.0).
B470	07/03/24	T. Cramton	0.20	Correspondence and internal discussions with MWE team re weekly cross-team conference, including follow up with N. Bull on same (.2).
B470	07/03/24	N. Bull	0.80	Conferences and correspondence with MWE team re discovery (.8).
B470	07/05/24	T. Cramton	0.30	Conference with N. Bull re case updates and next steps (.3).
B470	07/05/24	N. Bull	0.30	Conference with T. Cramton re strategy (.3).
B470	07/07/24	N. Bull	0.80	Review Synergy document protocol and related emails (.8).
B470	07/08/24	N. Bull	2.90	Conferences and correspondence with MWE team and Synergy counsel re strategy (1.5); revise draft NDA (1.0); correspondence with plaintiffs counsel (.4).
B470	07/09/24	N. Bull	1.00	Conference with MWE team re discovery (.5); revise draft NDA (.5).
B470	07/10/24	T. Cramton	1.00	Participate in weekly MWE cross-team conference (.4); follow up conference with N. Bull re same, including DLA proposed NDA/protective order (.2); review draft NDA and send back with comments and proposed edits on same (.4).
B470	07/10/24	N. Bull	2.10	Conferences and correspondence with D. Simon and



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LaVie Care Centers, LLC

Client: 120098  
Invoice: 3939913  
Invoice Date: 09/30/24

Task	Date	Name	Hours	Description
				plaintiffs' counsel re adversary proceeding (.8); conferences with MWE team re discovery (.8); revise NDA (.5).
B470	07/11/24	N. Bull	0.90	Multiple correspondence with Synergy counsel and MWE team re discovery and NDA (.4); review legal research (.5).
B470	07/15/24	E. Kwon	0.30	Review additional UCC data room documents (.3).
B470	07/15/24	N. Bull	0.40	Review and analyze stay letter and related emails (.4).
B470	07/16/24	E. Kwon	0.30	Review additional UCC data room documents (.3).
B470	07/16/24	N. Bull	0.80	Conference with MWE team and Ankura re investigation (.8).
B470	07/17/24	T. Cramton	0.30	Participate in weekly MWE cross-team conference re litigation workstreams (.3).
B470	07/17/24	B. Paulsen	0.30	Participate in weekly conference with MWE litigation team (.3).
B470	07/17/24	N. Bull	1.00	Conferences and correspondence with MWE team re investigation and discovery (1.0).
B470	07/18/24	B. Paulsen	4.30	Summarize research re [REDACTED] claims (4.3).
B470	07/18/24	N. Bull	0.40	Conference and correspondence with D. Simon, J. Haims and Synergy counsel re discovery (.4).
B470	07/19/24	N. Bull	2.00	Conferences and correspondence with J. Haims, D. Simon and UCC counsel re investigation (2.0).
B470	07/20/24	N. Bull	2.50	Conference with MWE team re adversary opposition and reply (1.2); review materials re same (1.3).
B470	07/21/24	N. Bull	5.70	Conferences with D. Simon, R. Perry and B. Jones re adversary proceeding (1.2); revise reply brief and review legal research (4.5).
B470	07/22/24	T. Cramton	0.50	Review and analyze interview memos from investigation team on FL litigations and FL divestment (.5).
B470	07/22/24	N. Bull	6.00	Conferences with D. Simon, B. Jones and R. Perry re adversary proceeding (1.5); revise reply papers (4.5).
B470	07/23/24	T. Cramton	0.20	Review emails and internal discussions with N. Bull and J. Haims on case updates and status (.2).
B470	07/23/24	N. Bull	1.00	Revise draft reply brief (1.0).
B470	07/24/24	T. Cramton	0.30	Communications with team re MWE weekly meeting (.1); review and analyze UCC data room



LaVie Care Centers, LLC

Client: 120098  
Invoice: 3939913  
Invoice Date: 09/30/24

Task	Date	Name	Hours	Description
				updates shared by E. Keil (.2).
B470	07/24/24	N. Bull	0.50	Confer with D. Simon and Synergy counsel re discovery (.5).
B470	07/25/24	N. Bull	2.20	Conference with Synergy counsel and MWE team re investigation (1.0); review order (.3); review draft NDA (.4); review adversary hearing transcript (.5).
B470	07/26/24	T. Cramton	0.20	Multiple correspondence with N. Bull re upcoming issues re Synergy and UCC 2004 requests, including preliminary review of same (.2).
B470	07/26/24	N. Bull	1.00	Multiple conferences with D. Simon and J. Anthony re discovery (.5); review 2004 motion (.5).
B470	07/27/24	T. Cramton	1.00	Conference with N. Bull to discuss case updates and next steps re adversary proceeding (1.0).
B470	07/27/24	N. Bull	0.80	Conference with T. Cramton re discovery and strategy (.5); correspondence with Synergy re same (.3).
B470	07/29/24	T. Cramton	1.90	Conference with DLA re Synergy docs and discovery (.8); prepare for same (.2); review transcript and order from adversary proceeding on stay (.5); debrief with N. Bull on discovery conference, plus comment and review on follow-up email for same (.4).
B470	07/29/24	E. Kwon	1.10	Prepare document production for case development review (1.1).
B470	07/29/24	N. Bull	5.00	Conferences and correspondence with MWE team and Synergy counsel re Committee discovery (2.5); conferences and correspondence with MWE team and Omega counsel re 2004 discovery (2.5).
B470	07/30/24	T. Cramton	3.60	Conference with D. Simon, N. Bull, and E. Keil re upcoming discovery conference with UCC counsel, including review of doc requests and proposed 2004 order for same (1.3); discovery conference with UCC counsel re email collection, 2004 requests, and other related issues (1.1); follow up conference with N. Bull re strategy and next steps for same (.5); legal research re interrogatory use in lieu of doc requests on non-parties under Rule 2004 (.4); prepare summary re reporting findings and analysis on same to N. Bull (.3).
B470	07/30/24	D. Valentino	0.80	Process EDOCS data and promote documents for



LaVie Care Centers, LLC

Client: 120098  
Invoice: 3939913  
Invoice Date: 09/30/24

Task	Date	Name	Hours	Description
				attorney review (.2); resolve technical issues and conduct final QC (.2); update search index (.2); update search term reports (.2).
B470	07/30/24	N. Bull	9.40	Multiple conferences and correspondence with D. Simon and E. Keil re meet and confer (1.5); participate in meet and confer (1.0); conference with D. Simon, J. Haims and J. Decker re investigation (.4); multiple conferences with D. Simon and E. Keil re objection (1.5); revise objection and review legal research (3.5); conference with D. Diaz re discovery (1.0); conference with T. Cramton re discovery (.5).
B470	07/30/24	A. Garcia	4.00	Process received documents into Relativity (4.0).
B470	07/31/24	B. Casten	0.70	Coordinate transfer and tracking of client documents in Relativity (.7).
B470	07/31/24	T. Cramton	1.80	Participate in MWE weekly cross-team meeting (.5); correspondence and internal discussions with MWE team re document collection and upload (.3); correspondence and internal discussions with E. Keil re data room (.4); prepare and circulate preliminary search terms (.4); review N. Bull's proposal re 2004 discovery requests (.2).
B470	07/31/24	E. Kwon	0.90	Review new UCC data room documents in the discovery document repository for quality assurance (.4); coordinate preparing email for case development review in Relativity (.5).
B470	07/31/24	B. Paulsen	0.50	Conference with MWE litigation team re discuss presentation and additional research (.5).
B470	07/31/24	N. Bull	2.90	Prepare for meet and confer (1.0); conferences with D. Simon and Synergy counsel re discovery (1.5); conference with J. Haims and T. Cramton re developments (.4).
<b>Total Hours</b>			<b>800.10</b>	

### Timekeeper Summary

Name	Hours	Rate	Amount
L. Barrett	12.30	1,245.00	15,313.50
J. Bishop Jones	8.50	360.00	3,060.00



LaVie Care Centers, LLC

Client: 120098  
 Invoice: 3939913  
 Invoice Date: 09/30/24

Name	Hours	Rate	Amount
N. Bull	86.10	1,650.00	142,065.00
B. Casten	0.70	690.00	483.00
T. Cramton	11.30	1,290.00	14,577.00
N. Fomba	41.10	1,200.00	49,320.00
L. Foody	37.90	1,040.00	39,416.00
A. Garcia	4.00	280.00	1,120.00
J. Haake	30.80	1,335.00	41,118.00
J. Haims	49.80	1,830.00	91,134.00
J. Jumbeck	70.30	1,245.00	87,523.50
G. Karch	2.80	2,210.00	6,188.00
E. Keil	162.60	1,245.00	202,437.00
E. Kwon	2.60	570.00	1,482.00
C. Lee	59.10	1,155.00	68,260.50
D. Northrop	27.40	745.00	20,413.00
B. Paulsen	5.10	1,200.00	6,120.00
N. Rainey	13.10	500.00	6,550.00
D. Simon	111.10	1,650.00	183,315.00
E. Song	6.50	395.00	2,567.50
A. Squillante	7.80	385.00	3,003.00
R. Trickey	17.70	925.00	16,372.50
H. Udow	12.80	1,200.00	15,360.00
D. Valentino	0.80	280.00	224.00
M. Wilder	1.00	1,975.00	1,975.00
C. Zhu	16.90	1,040.00	17,576.00
<b>Totals</b>	<b>800.10</b>		<b><u>\$1,036,973.50</u></b>

### Task Code Summary

Task Code	Description	Hours	Amount
B110	Case Administration	2.30	1,863.50
B130	Asset Disposition	11.60	13,681.00
B140	Relief from Stay/Adequate Protection Proceedings	4.10	4,771.50
B150	Mtgs/Communications w/Creditor	11.30	15,265.00
B155	Court Hearings	51.90	76,698.50
B160	Fee/Employment Applications	27.80	30,754.50
B170	Fee/Employment Objections	2.80	2,912.00
B185	Assumption/Rejection of Leases	4.20	5,229.00



LaVie Care Centers, LLC

Client: 120098  
Invoice: 3939913  
Invoice Date: 09/30/24

Task Code	Description	Hours	Amount
B190	Other Contested Matters	193.40	256,165.50
B195	Non-Working Travel	5.30	8,745.00
B210	Business Operations	105.70	102,974.00
B230	Financing/Cash Collections	2.10	2,614.50
B240	Tax Issues	3.80	8,163.00
B270	Utilities	2.40	3,042.00
B280	Vendor Matters	10.00	13,678.50
B290	Insurance	6.10	7,817.50
B310	Claims Administration & Object	16.10	20,040.00
B320	Plan and Disclosure Statement	127.40	160,089.00
B430	Internal Investigation	132.90	188,703.50
B470	Litigation	78.90	113,766.00
		800.10	1,036,973.50



**EXHIBIT B**

**Expense Detail**



LaVie Care Centers, LLC

Client: 120098  
Invoice: 3939913  
Invoice Date: 09/30/24

## Costs and Other Charges

Description	Amount
Business Meal	42.29
Dinner meal at Miami, FL airport on 7/22/2024 (N. Bull)	
Business Meal	70.90
Lunch meals on 7/23/2024 (D. Simon, B. Jones and R. Ahmed)	
Business Meal	173.12
Dinner meals on 7/23/2024 (D. Simon and J. Muenker)	
Business Meal	79.76
Dinner meal on 7/30/2024 (D. Simon)	
Computer Research - Westlaw	4,924.80
Computer Research - Pacer	897.50
Computer Research	87.64
VENDOR: CourtAlert.com Inc.; INVOICE#: 310026-2407; DATE: 7/31/2024 - fee for case research	
Computer Usage Charge - Data Review & Production Software	4,000.00
"July monthly fee for Discovery Platform Use (RelativityOne, 398.86 GBs)"	
Computer Usage Charge - Data Review & Production Software	82.80
"July monthly fee for Data Processing (RelativityOne, 2.07 GBs)"	
Miscellaneous	186.00
Transcript of second-day hearing held on June 27, 2024 in In re LaVie Care Centers, LLC, et al., Case No. 24-55507-pmb (U.S. Bankruptcy Court for the Northern District of Georgia)	
Miscellaneous	126.00
Transcript on July 10, 2024 omnibus hearing in In re LaVie Care Centers, LLC, et al., Case No. 24-55507 (PMB) (U.S. Bankruptcy Court for the Northern District of Georgia)	
Miscellaneous	488.80
Transcript of initial section 341 meeting of creditors held on June 28, 2024 in In re LaVie Care Centers, LLC, et al., Case No. 24-55507 (PMB) (U.S. Bankruptcy Court for the Northern District of Georgia) based on audio file received from the Office of the U.S. Trustee	
Miscellaneous	408.70
Transcript on July 24, 2024 in In re LaVie Care Centers, LLC, et al., Case No. 24-55507 (PMB) and hearing on Debtors' motion for extension of automatic stay in Adv. Pro. 24-5127 (PMB) (U.S. Bankruptcy Court for the Northern District of Georgia)	
Postage	31.20
VENDOR: Federal Express Corporation; INVOICE#: 855485940; DATE: 7/9/2024 - package to S. Sun	
Search Fees	105.00
VENDOR: Chapter 11 Dockets; INVOICE#: 136721; DATE: 7/18/2024 - June 2024	
Usage	
Search Fees	237.92



LaVie Care Centers, LLC

Client: 120098  
Invoice: 3939913  
Invoice Date: 09/30/24

Description	Amount
VENDOR: Chapter 11 Dockets; INVOICE#: 136721; DATE: 7/18/2024 - June 2024	
Usage	
Transportation/Parking	50.00
Parking at Miami, FL airport from 7/22/2024 to 7/24/2024 (N. Bull)	
Travel Expenses	570.98
Airfare from Miami, FL to Atlanta, GA on 7/22/2024 to participate at in-court hearing on motion for preliminary injunction (N. Bull)	
Travel Expenses	122.37
Dinner meal on 7/23/2024 (N. Bull)	
Travel Expenses	68.60
Uber ride from Atlanta, GA airport to hotel on 7/23/2024 (N. Bull)	
Travel Expenses	735.63
Hotel stay on 7/23/2024 to 7/24/2024 re hearing on motion for preliminary injunction (N. Bull)	
Travel Expenses	273.48
Airfare from Atlanta, GA to Miami FL on 7/24/2024 following in-court hearing on motion for preliminary injunction (N. Bull)	
Travel Expenses	74.16
Lunch meal on 7/24/2024 (N. Bull)	
Travel Expenses	62.18
Uber ride from hotel to Atlanta, GA airport on 7/24/2024 (N. Bull)	
<b>Total Costs and Other Charges</b>	<b>\$13,899.83</b>

**EXHIBIT A-3**

**Third Monthly Fee Statement**  
***August 1, 2024 – August 31, 2024***

**IN THE UNITED STATES BANKRUPTCY COURT  
NORTHERN DISTRICT OF GEORGIA  
ATLANTA DIVISION**

In re:	)	
	)	Chapter 11
	)	
LAVIE CARE CENTERS, LLC, <i>et al.</i> ,	)	Case No. 24-55507 (PMB)
	)	
Debtors. <sup>1</sup>	)	(Jointly Administered)
	)	
	)	<b>Obj. Deadline: November 21, 2024</b>
	)	

**SUMMARY OF THIRD MONTHLY FEE STATEMENT OF  
MCDERMOTT WILL & EMERY LLP, COUNSEL TO THE DEBTORS AND  
DEBTORS-IN-POSSESSION, FOR ALLOWANCE OF COMPENSATION AND  
REIMBURSEMENT OF EXPENSES FOR THE PERIOD  
FROM AUGUST 1, 2024 THROUGH AUGUST 31, 2024**

Name of Applicant:	<b>McDERMOTT WILL &amp; EMERY LLP</b>
Authorized to provide professional services to:	<b>Debtors and Debtors-in-Possession</b>
Date of retention:	<b>July 19, 2024, effective as of June 2, 2024</b>
Period for which compensation and reimbursement is sought:	<b>August 1, 2024 through August 31, 2024</b>
Amount of compensation sought as actual, reasonable and necessary:	<b>\$1,383,682.50</b>
Amount of expense reimbursement sought as actual, reasonable and necessary:	<b>\$23,579.78</b>
This is a:	<b>Third Monthly Fee Statement</b>

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<sup>1</sup> The last four digits of LaVie Care Centers, LLC's federal tax identification number are 5592. There are 282 Debtors in these chapter 11 cases, which are being jointly administered for procedural purposes only. A complete list of the Debtors and the last four digits of their federal tax identification numbers are not provided herein. A complete list of such information may be obtained on the website of the Debtors' claims and noticing agent at <https://www.veritaglobal.net/LaVie>. The location of LaVie Care Centers, LLC's corporate headquarters and the Debtors' service address is 1040 Crown Pointe Parkway, Suite 600, Atlanta, GA 30338.

**Prior Fee Statements:**

<b>Document</b>	<b>Date Served</b>	<b>Period Covered</b>	<b>Requested Fees/Expenses</b>	<b>Objections Served</b>
<b>First Monthly Fee Statement</b>	August 26, 2024	6/2/24 – 6/30/24	\$1,692,647.00 / \$38,882.94	None
<b>Second Monthly Fee Statement</b>	October 3, 2024	7/1/24 – 7/31/24	\$1,036,973.50 / \$13,899.83	None

**LAVIE CARE CENTERS, LLC, ET AL.  
SUMMARY OF BILLING BY PROFESSIONAL  
AUGUST 1, 2024 THROUGH AUGUST 31, 2024**

<b>Name of Professional Person</b>	<b>Date of Bar Admission</b>	<b>Position with the Applicant and Practice Area</b>	<b>Hourly Billing Rate</b>	<b>Total Billed Hours</b>	<b>Total Compensation</b>
Gary Karch	1980	Counsel; U.S. & International Tax	\$2,210	0.7	\$1,547.00
Michael Wilder	1995	Partner; U.S. & International Tax	\$1,975	0.5	\$987.50
Joel C. Haims	1994	Partner; Trial	\$1,830	60.5	\$110,715.00
Daniel M. Simon	2008	Partner; Corporate Advisory	\$1,650	165.8	\$273,570.00
Nathan M. Bull	2006	Partner; Trial	\$1,650	95.7	\$157,905.00
Ryan Smethurst	1999	Partner; Trial	\$1,650	0.3	\$495.00
Ryan Higgins	2007	Partner; Healthcare	\$1,600	0.4	\$640.00
Jack G. Haake	2011	Associate; Corporate Advisory	\$1,335	59.0	\$78,765.00
Tim C. Cramton	2018	Associate; Trial	\$1,290	115.8	\$149,382.00
Alex Spisak	2014	Associate; Trial	\$1,245	6.0	\$7,470.00
Emily C. Keil	2018	Associate; Corporate Advisory	\$1,245	191.3	\$238,168.50
Jake Jumbeck	2017	Associate; Corporate Advisory	\$1,245	41.8	\$52,041.00
Luke B. Barrett	2019	Associate; Corporate Advisory	\$1,245	10.2	\$12,699.00
Hilary Udow	2020	Associate; Trial	\$1,200	7.5	\$9,000.00



<b>Name of Professional Person</b>	<b>Date of Bar Admission</b>	<b>Position with the Applicant and Practice Area</b>	<b>Hourly Billing Rate</b>	<b>Total Billed Hours</b>	<b>Total Compensation</b>
Benjamin Paulsen	2018	Associate; Private Client	\$1,200	12.0	\$14,400.00
Crystal N. Fomba	2021	Associate; Trial	\$1,200	40.0	\$48,000.00
Dexter Golinghorst	2021	Associate; Healthcare	\$1,155	1.2	\$1,386.00
Catherine T. Lee	2021	Associate; Corporate Advisory	\$1,155	22.3	\$25,756.50
Chenjia Zhu	2022	Associate; Trial	\$1,040	39.3	\$40,872.00
Landon Foody	2023	Associate; Corporate Advisory	\$1,040	13.7	\$14,248.00
Hayden Putre	2021	Associate; Trial	\$925	24.6	\$22,755.00
Rebecca E. Trickey	2022	Associate; Corporate Advisory	\$925	32.1	\$29,692.50
Carson Clear	2023	Associate; Corporate Advisory	\$805	3.3	\$2,656.50
Milind Khurana	2023	Associate; Trial	\$805	30.3	\$24,391.50
Daniel Northrop	N/A	Paralegal; Corporate Advisory	\$745	18.7	\$13,931.50
Benjamin Casten	N/A	Discovery Consultant	\$690	1.0	\$690.00
Christine Gelat	2000	Discovery Counsel	\$590	32.5	\$19,175.00
Edward Kwon	N/A	Manager of Technology Project Management	\$570	21.0	\$11,970.00
Alex Schiller	N/A	Technology Project Manager	\$570	0.4	\$228.00
Vincent Norwood	N/A	Staff Attorney	\$515	2.9	\$1,493.50

<b>Name of Professional Person</b>	<b>Date of Bar Admission</b>	<b>Position with the Applicant and Practice Area</b>	<b>Hourly Billing Rate</b>	<b>Total Billed Hours</b>	<b>Total Compensation</b>
Nolley Rainey	N/A	Paralegal; Corporate Advisory	\$500	5.3	\$2,650.00
Jacque Bishop Jones	N/A	Paralegal; Corporate Advisory	\$360	7.0	\$2,520.00
Jerry Drew	N/A	Litigation Technology Manager	\$300	2.2	\$660.00
Daniel Valentino	N/A	Litigation Technology Data Analyst	\$280	5.6	\$1,568.00
Andy Garcia	N/A	Litigation Technology Data Analyst	\$280	4.5	\$1,260.00
Robert Crooks	N/A	Project Attorney	\$55	33.8	\$1,859.00
John Goebel	N/A	Project Attorney	\$55	36.4	\$2,002.00
David Hope	N/A	Project Attorney	\$55	36.2	\$1,991.00
Gabriel Rutherford	N/A	Project Attorney	\$55	36.8	\$2,024.00
Theodore Terrell	N/A	Project Attorney	\$55	38.5	\$2,117.50
<b>TOTALS</b>				<b>1,257.1</b>	<b>\$1,383,682.50</b>

**LAVIE CARE CENTERS, LLC, ET AL.  
COMPENSATION BY PROJECT CATEGORY  
AUGUST 1, 2024 THROUGH AUGUST 31, 2024**

<b>Project Category</b>	<b>Total Hours</b>	<b>Total Fees</b>
Case Administration	3.1	\$3,607.50
Asset Disposition	14.4	\$20,946.50
Relief from Stay / Adequate Protection Proceedings	58.1	\$65,050.50
Meetings/Communications with Creditors	20.0	\$27,268.50
Court Hearings	3.0	\$3,859.00
Fee/Employment Applications	14.5	\$16,863.50
Assumption/Rejection of Leases	12.6	\$15,387.00
Other Contested Matters	221.4	\$317,213.50
Business Operations	40.1	\$38,035.50
Employee Benefits/Pensions	0.6	\$801.00
Financing/Cash Collections	3.5	\$4,207.50
Tax Issues	1.7	\$3,359.50
Utilities	7.9	\$9,531.50
Vendor Matters	5.2	\$6,610.00
Insurance	7.4	\$9,486.00
Claims Administration & Objections	0.5	\$825.00
Plan and Disclosure Statement	152.80	\$207,652.50
Internal Investigation	173.50	\$238,926.00
General Corporate	0.4	\$640.00
Litigation	516.4	\$393,412.00
<b>TOTALS</b>	<b>1,257.1</b>	<b>\$1,383,682.50</b>

**LAVIE CARE CENTERS, LLC, ET AL.  
EXPENSE SUMMARY  
AUGUST 1, 2024 THROUGH AUGUST 31, 2024**

<b>Expense Category</b>	<b>Service Provider (if applicable)</b>	<b>Total Expenses</b>
Computer-Assisted Research	Various	\$13,345.75
Transcripts	N/A	\$516.30
Filing Fees	Various	\$233.00
Transportation/Parking	Various	\$10.00
Business Meals	Various	\$27.53
Discovery Hosting Charges	RelativityOne	\$9,447.20
<b>TOTAL</b>		<b>\$23,579.78</b>

**EXHIBIT A**

**Time Detail**



Invoice: 3950364  
Client: 120098

10/31/24

LaVie Care Centers, LLC  
1040 Crown Pointe Parkway  
Atlanta, GA 30338

For Services Rendered in Connection with:

Matter: 0013 Chapter 11

Task	Date	Name	Hours	Description
B110	08/01/24	D. Northrop	0.50	Obtain transcript of 7/31/2024 hearing on the Committee's motion for Rule 2004 examinations (.2); review same (.2); correspondence with MWE team re same (.1).
B110	08/05/24	J. Haake	0.50	Correspondence with R. Ahmed re service issues (.4); correspondence with D. Northrop re administrative issues (.1).
B110	08/06/24	D. Northrop	0.20	Obtain and review transcript of 8/2/2024 hearing (.1); correspondence with MWE team re same (.1).
B110	08/06/24	J. Haake	0.40	Prepare for and conference re case status and strategy (.4).
B110	08/20/24	J. Haake	0.20	Correspondence with J. Pyron re case administration issues (.2).
B110	08/27/24	D. Northrop	0.10	Correspondence with J. Haake re transcript of 7/24/2024 hearing in Adv. Pro. 24-5127 on Debtors' motion to extend the automatic stay and/or preliminarily enjoin claims and causes of action (.1).
B110	08/28/24	J. Haake	1.10	Correspondence with M. Villa of Verita and E. Keil re service issues and research service parties (1.1).
B110	08/30/24	D. Northrop	0.10	Review notice of change in composition of the official Committee of unsecured creditors, and correspondence with MWE team re same (.1).
B130	08/06/24	D. Simon	0.50	Multiple conferences with Stout and others re IOIs and bids (.5).
B130	08/14/24	D. Golinghorst	0.80	Draft revisions to APA form for sale process (.8).
B130	08/14/24	E. Keil	1.40	Revise form OTA (1.4).
B130	08/15/24	D. Golinghorst	0.40	Review bankruptcy team comments to Operations Transfer Agreement (.2); conference with E. Keil re disclosure schedules to same (.2).
B130	08/15/24	L. Foody	0.20	Review and revise NDA (.2).
B130	08/15/24	E. Keil	2.70	Revise form OTA and corresponding schedules



**McDermott  
Will & Emery**

LaVie Care Centers, LLC

Client: 120098  
Invoice: 3950364  
Invoice Date: 10/31/24

Task	Date	Name	Hours	Description
				(2.1); conference with D. Golinghorst re same (.3); correspondence with Stout team re same (.2); conference with Stout team re same (.1).
B130	08/15/24	D. Simon	0.80	Participate in update conference re sale process (.3); conference with Proskauer re ABL and sale process (.5).
B130	08/22/24	J. Haake	0.70	Prepare for and participate in conference with MWE team re sale process and strategy (.7).
B130	08/22/24	D. Simon	1.30	Multiple conferences with Stout, client re sale process and related issues (1.3).
B130	08/24/24	D. Simon	2.10	Conference with J. Decker, B. Jones and L. Halperin re sale and related issues (1.4); conferences with J. Muenker re sale and plan issues (.7).
B130	08/26/24	J. Haake	0.40	Prepare for and participate in conference with M. Krakovsky and D. Simon re sale process and strategy (.4).
B130	08/26/24	D. Simon	1.10	Communications with Stout and J. Decker re sale matters (1.1).
B130	08/28/24	D. Simon	1.10	Multiple conferences with Stout, DIP lenders, and Chapman re bids and sale items (1.1).
B130	08/29/24	D. Simon	0.80	Multiple conferences with Chapman and Stout re sale process matters (.8).
B130	08/30/24	D. Northrop	0.10	Review reservation of rights of the Chubb Companies with respect to proposed sale, and correspondence with MWE team re same (.1).
B140	08/01/24	C. Lee	1.80	Research legal issues re [REDACTED] (1.3); summarize same (.3); correspond with D. Simon and Company re same (.2).
B140	08/02/24	J. Haake	4.20	Research [REDACTED] issues and correspondence with D. Simon and E. Keil re same (2.1); review state court pleadings and insurance documents (1.0); prepare for and conference with F. Nason re lift stay motions (.8); correspondence with J. Watson re lift stay issues (.3).
B140	08/05/24	L. Foody	1.40	Review precedent for adjournment of relief from stay pleading (.3); draft notice of adjournment (.7); research re [REDACTED] (.4).
B140	08/05/24	J. Haake	0.90	Prepare for and conference with D. Simon and D. Thomas re lift stay motion (.6); correspondence with F. Nason re same and notice adjourning hearing (.3).





**McDermott  
Will & Emery**

LaVie Care Centers, LLC

Client: 120098  
Invoice: 3950364  
Invoice Date: 10/31/24

Task	Date	Name	Hours	Description
B140	08/07/24	J. Haake	0.20	Correspondence with T. Daluz re lift stay issue (.2).
B140	08/08/24	J. Haake	0.90	Prepare for and conference with K. DePillis and T. Daluz re lift stay motion and potential terms of an agreed order (.9).
B140	08/08/24	L. Foody	1.90	Draft objection to relief from stay motion (1.9).
B140	08/09/24	J. Haake	0.90	Conferences and correspondence with representatives of AHCA (.3); prepare for and conference with G. Rininger of AHCA re agreement to modify stay (.5); correspondence with D. Simon re same (.1).
B140	08/14/24	R. Trickey	0.10	Conference with J. Haake re motion for limited relief from automatic stay (.1).
B140	08/14/24	J. Haake	0.70	Review motion to lift stay and correspondence with T. Daluz re settlement conference (.7).
B140	08/15/24	R. Trickey	2.10	Correspond with J. Haake re limited motion to lift stay (.2); draft same (1.9).
B140	08/15/24	D. Northrop	0.20	Review motion of Ginger Ormond, as personal representative of the estate of Susan James, to modify the automatic stay to liquidate personal injury tort claim in pending litigation, pursue recovery to the extent of insurance coverage, and grant related relief (.1); correspondence with MWE team re same (.1).
B140	08/15/24	J. Haims	0.40	Review motion filed by estate of Susan James to modify automatic stay and liquidate claim (.4).
B140	08/16/24	A. Spisak	0.50	Review client insurance policies re pending motion to lift stay (.5).
B140	08/16/24	J. Haake	2.70	Review insurance policies and prepare for conference with F. Nason re lift stay (.8); conference with F. Nason re same (.7); revise draft motion for limited relief from stay, and correspondence with R. Trickey and D. Simon re same (1.2).
B140	08/16/24	R. Trickey	3.90	Draft limited motion to lift stay (3.6); correspond with J. Haake re same (.3).
B140	08/19/24	R. Trickey	2.50	Research and analyze issues re [REDACTED] (2.2); correspond with J. Haake re same (.3).
B140	08/20/24	R. Trickey	4.80	Research matters re objections to limited relief from stay (1.2); correspond with J. Haake re same (.2); draft objection to relief from stay (3.4).



LaVie Care Centers, LLC

Client: 120098  
Invoice: 3950364  
Invoice Date: 10/31/24

Task	Date	Name	Hours	Description
B140	08/20/24	J. Haake	1.20	Correspondence with R. Trickey re lift stay issues (.4); correspondence with D. Simon and J. Watson re same (.5); correspondence with K. DePillis re same (.3).
B140	08/21/24	A. Spisak	0.50	Review client insurance policies in connection with motion to lift stay (.5).
B140	08/21/24	R. Trickey	3.40	Draft objection to Occilien lift stay motion (3.0); correspond with J. Haake re same (.1); review Ormond lift of stay motion (.1); review insurance policy related to same (.2).
B140	08/21/24	J. Haake	1.40	Review and revise objection to motion to lift stay (.8); review lift stay insurance issues and correspondence with F. Nason re lift stay (.6).
B140	08/22/24	A. Spisak	3.50	Review several client insurance policies in connection with motion to lift stay (3.5).
B140	08/22/24	J. Haake	1.40	Prepare for and conference with F. Nason re lift stay and insurance issues (1.0); correspondence with D. Simon re lift stay issues (.4).
B140	08/22/24	R. Trickey	1.00	Revise Occilien lift stay objection re insurance background information (.7); correspond with A. Spisak re insurance coverage matters re objection background (.1); conference with J. Haake re lift stay objections (.2).
B140	08/26/24	R. Trickey	2.10	Research issues re [REDACTED] (1.2); correspond with J. Haake re same (.4); revise lift stay objections (.5).
B140	08/26/24	J. Haake	4.20	Revise draft objection to lift stay motions and correspondence with R. Trickey re same (2.3); correspondence with B. Hoerbelt re motion for limited relief from stay (.5); draft notice of adjournment and correspondence with F. Nason re same (.6); revise draft order re lift stay motion re AHCA in anticipation of filing same (.8).
B140	08/26/24	L. Foody	0.30	Conference with Allianztrade re automatic stay (.3).
B140	08/28/24	J. Haake	2.70	Correspondence with B. Hoerbelt re motion for relief from stay (.6); revise limited motion to lift stay as to AHCA and finalize for filing (.8); draft notice of relief stay motion and correspondence with D. Northrop re same (.7); correspondence with N. Brannick re lift stay motion (.4); correspondence



LaVie Care Centers, LLC

Client: 120098  
Invoice: 3950364  
Invoice Date: 10/31/24

Task	Date	Name	Hours	Description
B140	08/28/24	R. Trickey	0.90	with D. Thomas re AHCA agreement (.2). Revise objections to lift stay motions to accurately reflect insurance information (.9).
B140	08/28/24	D. Northrop	3.00	Review draft joint notice of adjournment of hearing on motions for relief from the automatic stay (by Occilien Movants and Ormond Movant) (.1); revise same (.3); correspondence with J. Haake re revisions to the notice (.1); finalize notice for filing (.1); file notice of adjournment (.2); correspondence with J. Haake re coordinating supplemental service of the notice by Verita Global (.2); correspondence with J. Haake re preparation of notice of hearing for Debtors' motion for limited relief from the automatic stay, to the extent applicable, to permit Debtor Donegan Square Health Care Associates, LLC to perform under AHCA Agreement (.1); review draft of Debtors' motion for limited relief from the automatic stay, related proposed order and related notice of hearing and deadline to object (.4); revise Debtors' motion for limited relief from the automatic stay, proposed order and notice of hearing (.5); correspondence with J. Haake re revisions to stay relief motion (.2); finalize motion for limited relief from the automatic stay, proposed order, and notice of hearing for filing (.1); file same (.3); pay filing fee for Debtors' motion for limited relief from the automatic stay (.2); coordinate service of Debtors' motion for limited relief from the automatic stay, proposed order, and notice of hearing by Verita Global (.1); review motion filed on behalf of the Estate of Janet Smith to modify automatic stay to liquidate personal injury tort claim in pending litigation and pursue recovery to the extent of insurance coverage, and correspondence with MWE team re same (.1).
B140	08/29/24	R. Trickey	0.90	Review additional lift stay motion (.3); review relevant insurance policy and underlying civil case docket (.4); correspond with A. Spisak re insurance matters related to lift stay motion (.2).
B140	08/30/24	A. Spisak	1.50	Review several client insurance policies in



LaVie Care Centers, LLC

Client: 120098  
Invoice: 3950364  
Invoice Date: 10/31/24

Task	Date	Name	Hours	Description
				connection with motion to lift stay (1.5).
B150	08/10/24	E. Keil	0.80	Conference with B. Jones, R. Ahmed, et al. re 341 meeting preparations (.8).
B150	08/10/24	D. Simon	0.60	Multiple conferences with Ankura re 341 prep (.6).
B150	08/11/24	E. Keil	1.50	Correspondence with B. Jones re 341 meeting preparation (.2); prepare materials re same (1.3).
B150	08/12/24	E. Keil	5.30	Prepare for and participate in continued 341 meeting (4.2); correspondence with R. Ahmed, B. Jones, et al. re follow-up inquiries from 341 meeting (.3); compile responses re same (.8).
B150	08/12/24	D. Northrop	0.30	Communications with E. Keil re obtaining audio file of continued section 341 meeting of creditors held on 8/12/2024 (.1); draft email to the office of the US Trustee with request to same (.2).
B150	08/12/24	D. Simon	4.80	Participate in continued 341 meeting (4.8).
B150	08/14/24	D. Northrop	0.10	Draft follow-up email to the office of the US Trustee (Region 21) re status of request to obtain audio file of the continued section 341 meeting of creditors (.1).
B150	08/15/24	E. Keil	0.40	Correspondence with J. Adams re 341 follow-up inquiries (.2); review list provided by same (.2).
B150	08/16/24	D. Northrop	0.10	Conference with C. Ducille of the US Trustee's office in Atlanta to inquire re status of request to obtain audio file of the continued 341 meeting of creditors held on 8/12/2024 (.1).
B150	08/19/24	E. Keil	0.80	Correspondence with S. Lieb re insurance policies (.8).
B150	08/19/24	D. Simon	2.30	Multiple conferences with Committee re mediation and next steps (.7); numerous follow up conferences with DIP lenders re same (1.2); conferences with F. Lawall re mediation issues (.4).
B150	08/19/24	D. Northrop	0.10	Correspondence with R. Peterson of the Office of the US Trustee for Region 21 re request for audio files of the continued section 341 meeting of creditors held on 8/12/2024 and projected delivery of the audio files on 8/20/2024 (.1).
B150	08/20/24	D. Northrop	0.90	Obtain audio files (three in total) re continued section 341 meeting of creditors (held on 8/12/2024) from the office of the US Trustee (.2); review audio files (.4); communications with transcription agency



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LaVie Care Centers, LLC

Client: 120098  
Invoice: 3950364  
Invoice Date: 10/31/24

Task	Date	Name	Hours	Description
				to arrange for preparation of transcript of the continued section 341 meeting of creditors, including uploading the audio files to the transcription agency's portal (.3).
B150	08/21/24	E. Keil	1.60	Draft responses re UST 341 follow-up inquiries (.7); correspondence with D. Simon, J. Adams, et al. re same (.3); correspondence with creditors re proof of claim, cure notice issues (.6).
B150	08/26/24	E. Keil	0.40	Draft correspondence with Ohio AG re inquiries (.4).
B155	08/02/24	E. Keil	0.50	Prepare for and participate in hearing re 2004 motion (.5).
B155	08/02/24	N. Bull	0.80	Prepare for and participate in hearing re 2004 discovery and related emails re order and scheduling (.8).
B155	08/25/24	E. Keil	0.60	Draft notice of continued hearings (.6).
B155	08/26/24	E. Keil	0.40	Revise notice of continued hearings (.2); correspondence with D. Northrop re filing of same (.1); correspondence with D. Simon re omnibus hearings (.1).
B155	08/28/24	D. Northrop	0.30	Finalize Debtors' second notice of omnibus hearings for filing (.1); file same (.2).
B155	08/28/24	E. Keil	0.30	Draft notice of omnibus hearings (.2); correspondence with chambers re same (.1).
B155	08/29/24	D. Northrop	0.10	Communications with E. Keil re status of matters set for 9/4/2024 omnibus hearing (.1).
B160	08/05/24	L. Foody	1.60	Conference with potential ordinary course professional (.6); conference with E. Keil re same (.2); follow up conference with professional re same (.6); draft summary re same (.2).
B160	08/05/24	E. Keil	0.60	Conference with L. Foody re OCP (.6).
B160	08/06/24	E. Keil	0.40	Correspondence with OCP re declarations (.4).
B160	08/07/24	E. Keil	0.50	Draft supplemental declaration re retention (.5).
B160	08/16/24	E. Keil	1.20	Review June time detail for privilege issues and compliance with Local Rules (1.2).
B160	08/19/24	E. Keil	3.20	Review June time detail for privilege issues and compliance with Local Rules (3.2).
B160	08/21/24	E. Keil	0.40	Draft June fee statement (.4).
B160	08/22/24	E. Keil	0.90	Revise MWE June fee statement (.9).
B160	08/23/24	E. Keil	0.60	Correspondence re OCP notices with D. Northrop



LaVie Care Centers, LLC

Client: 120098  
Invoice: 3950364  
Invoice Date: 10/31/24

Task	Date	Name	Hours	Description
				(.2); revise MWE fee statement (.4).
B160	08/26/24	E. Keil	0.90	Review and finalize June fee statement (.7); draft correspondence to fee notice parties re same (.2).
B160	08/30/24	L. Foody	4.20	Review and revise July time entries for privilege issues and compliance with Local Rules (4.2).
B185	08/01/24	E. Keil	0.40	Conference with Third Wave counsel re cure notice (.4).
B185	08/02/24	E. Keil	0.20	Correspondence with creditor re cure notice (.2).
B185	08/06/24	E. Keil	0.70	Correspondence with contract counter parties re cure notice (.7).
B185	08/13/24	E. Keil	1.60	Analyze contract cure objections (1.2); correspondence with Ankura team re same (.4).
B185	08/15/24	E. Keil	0.60	Correspondence with Third Wave re cure notice (.2); review materials provided by same (.4).
B185	08/16/24	E. Keil	2.70	Review and analyze informal cure objection materials (2.4); correspondence with Ankura re same (.3).
B185	08/19/24	E. Keil	0.80	Conference with J. Brilliant, R. Ahmed re cure notice revisions (.6); conference with J. Brilliant re same (.2).
B185	08/20/24	E. Keil	1.10	Review revised cure notice (.5); draft notice re same (.6).
B185	08/22/24	E. Keil	0.90	Revise cure notice (.4); correspondence with contract counterparties re same (.5).
B185	08/23/24	E. Keil	0.30	Revise amended cure notice (.3).
B185	08/26/24	D. Northrop	0.10	Review objection of Cigna to notice to contract parties to potentially assumed executory contracts and unexpired leases, and correspondence with MWE team re same (.1).
B185	08/26/24	E. Keil	1.10	Correspondence with contract counterparties re cure objections (.4); review objections re same (.5); revise tracker re same (.2).
B185	08/27/24	E. Keil	0.90	Correspondence with contract counterparties re cure notice objections (.6); revise amended cure notice re same (.3).
B185	08/28/24	D. Northrop	0.50	Review notice of revised list of potentially assumed executory contracts and unexpired leases and related cure costs (.2); file same (.2); review AmeriHealth Caritas Health Plan's d/b/a AmeriHealth Caritas Pennsylvania objection to notice to contract parties





LaVie Care Centers, LLC

Client: 120098  
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Invoice Date: 10/31/24

Task	Date	Name	Hours	Description
				to potentially assumed executory contracts and unexpired leases, and correspondence with MWE team re same (.1).
B185	08/28/24	E. Keil	0.70	Correspondence with contract counterparties re cure notice (.5); update tracker re same (.2).
B190	08/01/24	E. Keil	0.80	Revise disclosures re Dias & Associates (.8).
B190	08/01/24	D. Simon	0.80	Communications with E. Keil and N. Bull re 2004 and related discovery topics (.8).
B190	08/02/24	E. Keil	0.50	Correspondence with F. Lawall, D. Kovsky re Dias disclosures (.3); revise same (.2).
B190	08/02/24	D. Simon	0.70	Multiple conferences with N. Bull and J. Muenker re discovery and related issues (.7).
B190	08/05/24	D. Simon	4.10	Conference with J. Anthony and N. Bull re outstanding litigation issues (.9); conference with Synergy re lift stay motions (.5); multiple conferences re email discovery and related issues (1.5); analyze various discovery matters (1.2).
B190	08/05/24	E. Keil	1.50	Revise Dias disclosures (.9); conference with D. Kovsky, F. Lawall re discovery search terms (.6).
B190	08/06/24	C. Lee	0.50	Review and analyze Recovery Corp.'s motion to dismiss or convert (.5).
B190	08/06/24	E. Keil	3.60	Review and analyze DACA issues (3.1); prepare responses re same and update data room (.5).
B190	08/06/24	D. Simon	4.50	Multiple conferences with N. Bull re open litigation items (1.3); multiple conferences with J. Muenker re emails and discovery matters (.8); review motion to dismiss and related discovery (1.2); multiple conferences with Committee re open discovery and related issues (.5); multiple conferences with DIP lenders re same (.7).
B190	08/06/24	D. Northrop	0.30	Review Committee's notice of intent to serve subpoenas for Rule 2004 examinations and document production, and Recovery Corp.'s motion to dismiss or convert Florida Divestco reorganizations (.2); correspondence with MWE team re same (.1).
B190	08/06/24	J. Haims	0.70	Review Recovery Corp.'s motion to dismiss or convert Florida DivestCo reorganizations (.7).
B190	08/06/24	N. Bull	2.00	Review Recover Corp.'s motion to dismiss and related materials (2.0).





LaVie Care Centers, LLC

Client: 120098  
Invoice: 3950364  
Invoice Date: 10/31/24

Task	Date	Name	Hours	Description
B190	08/07/24	E. Keil	4.00	Conference with litigation team re status update (.2); revise Dias declaration (.3); conferences with D. Simon re data room, status updates (.7); conference with T. Cramton re motion to dismiss (.5); prepare for and participate in meet and confer with Troutman (.9); revise EEOC language (.9); analyze DACA's request and draft responses to UCC re same (.5).
B190	08/07/24	D. Simon	6.80	Participate in meet and confer with Committee (.8); multiple conferences with Synergy re various discovery and related issues (1.2); multiple conferences with DIP lenders re same (1.7); internal conferences with N. Bull re litigation strategies (1.1); review various diligence/transaction questions from FTI (.5); conference with Ankura re same (.3); numerous communications re motion to dismiss (1.2).
B190	08/08/24	C. Lee	3.90	Conference with E. Keil and MWE team re motion to dismiss or convert (1.1); research legal issues re same (2.2); summarize findings re same (.5); correspond with E. Keil re same (.1).
B190	08/08/24	E. Keil	2.60	Prepare for and participate in meet and confer with UCC, DLA (.4); conference with T. Cramton, N. Bull, et al. re motion to dismiss (1.0); research re same (1.2).
B190	08/08/24	D. Simon	5.10	Participate in meet and confer with Committee and Synergy (.7); internal conferences re motion to dismiss (1.4); multiple conferences with DIP lenders re discovery matters (.8); conference with investigation team (.8); analyze motion to dismiss issues (1.4).
B190	08/08/24	T. Cramton	2.00	Legal research for [REDACTED] (2.0).
B190	08/08/24	N. Bull	2.00	Review motion to dismiss papers (1.0); conferences with MWE team re same (1.0).
B190	08/09/24	E. Keil	4.70	Conferences with D. Simon, B. Jones, L. Halperin, J. Decker, et al. re status updates (2.9); research re [REDACTED] (1.8).
B190	08/09/24	T. Cramton	4.70	Legal research re [REDACTED]



LaVie Care Centers, LLC

Client: 120098  
Invoice: 3950364  
Invoice Date: 10/31/24

Task	Date	Name	Hours	Description
				[REDACTED] (4.2); follow up emails and internal conference on same (.5).
B190	08/09/24	D. Simon	5.40	Conference with Synergy re FTI diligence requests (1.0); conference with D. Dias re same (.5); conferences with Ankura re same (1.2); conference with J. Anthony re motion to dismiss (.5); multiple conferences with N. Bull re same (.8); conferences with C. Bryson re interview and discovery (.4); analyze discovery matters (1.0).
B190	08/11/24	D. Simon	1.50	Multiple conferences with N. Bull and L. Aiken re discovery issues (.5); conference with J. Muenker and C. Bryson re informal interview and strategy (1.0).
B190	08/12/24	D. Simon	1.30	Conference with DIP lenders re discovery (.5); conference with N. Bull re same (.5); communications with J. Anthony re discovery issues (.3).
B190	08/13/24	E. Keil	4.60	Research re [REDACTED] (1.9); conferences with D. Simon, N. Bull re same (.2); revise confidentiality agreement (.4); research re [REDACTED] (2.1).
B190	08/13/24	D. Simon	0.80	Multiple communications with J. Anthony and N. Bull re discovery issues (.8).
B190	08/14/24	E. Keil	2.40	Conference with J. Anthony, N. Bull, et al. re motion to dismiss (.6); conference with B. Jones, R. Ahmed, et al. re same (1.0); conference with T. Cramton, N. Bull re same (.6); correspondence with J. Watson re privilege screen (.2).
B190	08/14/24	D. Simon	2.20	Conference with J. Anthony re discovery and adversary matters (.8); follow up conference with N. Bull re same (.5); conference with Ankura re open diligence items from FTI (.4); follow up conference with Synergy re same (.5).
B190	08/15/24	D. Simon	7.00	Participate in informal interview of C. Bryson and others (2.0); multiple conferences with DIP lenders and Synergy re same (1.3); conference with D. Dias re discovery issues (.4); multiple conferences with J. Decker and L. Halperin re discovery and mediation issues (1.0); conferences with B. Jones, L. Halperin



LaVie Care Centers, LLC

Client: 120098  
Invoice: 3950364  
Invoice Date: 10/31/24

Task	Date	Name	Hours	Description
				and J. Decker re Committee discovery and strategy (.6); conferences with Committee re discovery and depositions (.3); conferences with N. Bull re discovery matters (.4); communications with parties re potential mediators (1.0).
B190	08/16/24	E. Keil	3.40	Draft objection to motion to dismiss (1.3); research re same (2.1).
B190	08/16/24	D. Simon	2.50	Multiple conferences with client re discovery and investigatory issues (.7); conferences with DIP lenders re same (.6); conferences with N. Bull re discovery matters (.7); conferences with Committee re mediation and settlement issues (.5).
B190	08/17/24	D. Simon	1.20	Conference with litigation team re outstanding discovery issues (1.2).
B190	08/17/24	E. Keil	1.00	Conference with D. Simon, N. Bull re discovery workstreams (1.0).
B190	08/18/24	E. Keil	2.50	Conferences with B. Jones, R. Ahmed re waterfall (2.5).
B190	08/19/24	E. Keil	1.30	Review and comment re deadline revisions (.4); conferences with D. Simon re same (.6); conference with T. Cramton re discovery (.3).
B190	08/19/24	D. Simon	2.40	Conference with N. Bull and J. Haims re discovery and investigation (1.0); analyze Committee issues and case law re same (1.4).
B190	08/20/24	E. Keil	5.30	Revise stipulated confidentiality agreement (.8); draft certification of counsel re same (.5); correspondence with A. Marchant-Lessa re same (.3); correspondence with D. Kovsky, L. Aiken, et al. re same (.4); conferences with T. Cramton, N. Bull, et al. re discovery responses (2.6); draft responses to same (.7).
B190	08/20/24	D. Simon	7.00	Multiple conferences re HNRA discovery (3.4); multiple conferences with Committee re claims and causes of action (.5); conferences with DIP lenders re same (.6); conference with J. Haims and N. Bull re same (.5); conference with J. Muenker re Committee diligence items (.7); conferences re plan term sheet (.4); conference with L. Barrett re research (.3); numerous communications re mediation and schedule (.6).



LaVie Care Centers, LLC

Client: 120098  
Invoice: 3950364  
Invoice Date: 10/31/24

Task	Date	Name	Hours	Description
B190	08/21/24	T. Cramton	1.00	Prep and send legal research issues to H. Putre and M. Khurana re [REDACTED] (.4); review and analyze M. Khurana's findings and analysis on same, including request for follow up (.6).
B190	08/21/24	E. Keil	5.60	Conference with T. Cramton, E. Kwon re discovery (.4); conference with T. Cramton, N. Bull, et al. re same (.4); review documents re HNSRC discovery requests (2.9); revise certification of counsel re stipulation (.5); correspondence with A. Marchant-Lessa re same (.3); correspondence with D. Kovsky, L. Aiken, J. Muenker, et al. re same (.5); revise stipulation re same (.4); prepare same for filing (.2).
B190	08/21/24	D. Northrop	0.80	Review certification of counsel re order approving stipulated and agreed to confidentiality agreement and protective order (.1); file certification of counsel (.2); upload proposed order approving stipulated and agreed to confidentiality agreement and protective order (.1); review order approving stipulated and agreed to confidentiality agreement and protective order entered on 8/21/2024, and correspondence with MWE team re same (.1); review objections and responses to UCC Rule 2004 document requests filed by Floridean SNF Operations, LLC, et al. and New Port Richey Opco, LLC, et al. (.2); correspondence with MWE team re same (.1).
B190	08/21/24	D. Simon	1.60	Review discovery materials and analyze issues in connection with same (1.2); emails re mediation and revised time line (.4).
B190	08/22/24	E. Keil	4.40	Review documents for responsiveness re HNSRC discovery (3.9); conference with D. Kovsky, L. Halperin, et al. re mediation timeline (.5).
B190	08/22/24	D. Simon	3.60	Numerous communications re discovery, mediation and related issues (3.3); conferences with DIP lenders re discovery matters (.3).
B190	08/23/24	L. Foody	0.30	Research re [REDACTED] (.3).
B190	08/23/24	D. Simon	2.40	Multiple communications with litigation team re production, discovery and related matters (2.4).
B190	08/23/24	E. Keil	5.80	Conference with B. Jones, R. Ahmed re MTD (.7);



LaVie Care Centers, LLC

Client: 120098  
Invoice: 3950364  
Invoice Date: 10/31/24

Task	Date	Name	Hours	Description
				review same (.6); research re [REDACTED] (1.0); draft motion re same (1.5); conference with D. Simon re same (.2); conference with J. Watson re settlement agreements (.5); review same (1.3).
B190	08/24/24	D. Simon	0.20	Revise mediation motion (.2).
B190	08/24/24	E. Keil	0.60	Revise mediation motion (.4); correspondence with mediation parties re same (.2).
B190	08/25/24	E. Keil	3.20	Revise mediation motion and proposed order (.4); revise objection to motion to dismiss (2.5); correspondence with D. Simon re same (.3).
B190	08/26/24	D. Simon	2.00	Conference with J. Cavender re mediation matters (.6); analyze matters relating to causes of action and investigatory matters (1.4).
B190	08/26/24	E. Keil	4.10	Correspondence with A. Marchant-Lessa, mediation parties re mediation motion and proposed order (.4); revise same (.3); correspondence with D. Northrop re filing of same (.1); revise objection to motion to dismiss (1.3); conference with J. Cavender, mediation parties re mediation (.6); compile docket entries and contact information re same (.9); correspondence with mediation parties re same (.2); correspondence with D. Simon re same (.1); revise same (.2).
B190	08/27/24	D. Northrop	0.10	Review correspondence from E. Keil re no objections having been filed to Debtors' motion for order approving settlement by and among Debtors, Baruch Jeremias and Yaakov Sod re promissory note, and upload proposed order approving settlement (.1).
B190	08/27/24	D. Simon	8.40	Participate in meet and confer with J. Anthony (.5); participate in conference with investigative team re status and next steps (1.5); numerous communications with E. Keil and others re same (1.2); conferences with J. Muenker re document production (.6); conference with Aspire counsel re requests (.5); conferences with N. Bull and J. Haims re open litigation issues (1.6); conferences with Ankura re same (.7); analysis re divestiture transactions (1.8).





LaVie Care Centers, LLC

Client: 120098  
Invoice: 3950364  
Invoice Date: 10/31/24

Task	Date	Name	Hours	Description
B190	08/27/24	E. Keil	5.70	Correspondence with MWE team re discovery production (.3); review documents re same (.6); draft correspondence to J. Cavender re mediation (.2); prepare for and participate in meet and confer with J. Anthony (.5); conference with D. Simon re waterfall analysis (.5); conference with B. Jones, R. Ahmed re same (.7); review and revise analysis re same (2.9).
B190	08/28/24	D. Northrop	0.10	Review order, entered 8/28/2024, approving settlement by and among Debtors, Baruch Jeremias and Yaakov Sod re promissory note, and correspondence with MWE team re same (.1).
B190	08/28/24	E. Keil	12.50	Analyze matters in connection with mediation (4.1); conferences with MWE team, Ankura team re same (3.4); draft presentations re same (5.0).
B190	08/28/24	D. Simon	5.90	Numerous conferences with Chapman, Ankura, and MWE re investigative research topics (4.2); review research re same (1.3); conferences with Committee re mediation matters (.4).
B190	08/29/24	E. Keil	8.80	Revise presentations for mediation (2.3); analyze issues in connection with same (4.5); correspondence and conferences with D. Simon re same (.5); revise objection to motion to dismiss (1.5).
B190	08/29/24	D. Simon	8.50	Conference with Synergy re open discovery matters (.7); review materials in connection with same (.8); draft and revise mediation statement (4.1); review and discuss open research matters (2.0); review transaction timeline (.4); review summary chart relating to same (.5).
B190	08/30/24	E. Keil	8.10	Revise objection to motion to dismiss (2.2); conference with MWE team, Ankura team re mediation, contested matters (1.6); conference with D. Simon re materials for same (.7); revise same (1.5); research re [REDACTED] (2.1).
B190	08/30/24	D. Simon	7.20	Revise mediation statement (1.8); conferences with Chapman, Ankura and MWE team re investigation matters (2.0); conference with Committee re next steps (.2); review research re [REDACTED] (1.5); draft transaction timeline PPT (1.2);



LaVie Care Centers, LLC

Client: 120098  
Invoice: 3950364  
Invoice Date: 10/31/24

Task	Date	Name	Hours	Description
				conference with Aspire counsel (.5).
B190	08/30/24	N. Bull	2.00	Revise draft mediation statement (2.0).
B190	08/31/24	J. Haake	0.50	Review mediation statement and correspondence with D. Simon re same (.5).
B190	08/31/24	E. Keil	6.10	Revise objection to motion to dismiss (4.8); research re same (1.3).
B190	08/31/24	D. Simon	4.30	Draft and revise divestiture PPT (2.0); revise mediation statement (1.6); revise cause of action chart (.7).
B210	08/01/24	J. Haake	0.50	Correspondence with C. Chrispell re operational issues (.5).
B210	08/01/24	J. Haake	0.50	Prepare for and participate in conference with Ankura and Stout re status of case and strategy (.4).
B210	08/01/24	E. Keil	0.40	Conference with J. Decker, B. Jones, et al. re status update (.4).
B210	08/05/24	D. Simon	2.00	Conferences re operational matters, including United Healthcare (2.0).
B210	08/05/24	E. Keil	1.80	Review and revise Schedule G amendments (1.8).
B210	08/06/24	E. Keil	1.20	Conference with J. Decker, B. Jones, et al. re status update (.5); conference with J. Haake, D. Simon re CHOW updates (.5); correspondence with KCC team re Schedule G amendments (.2).
B210	08/06/24	D. Northrop	2.10	File amended Schedule G for certain Debtor entities (1.9); communications with E. Keil re coordination of filing of amended Schedule G for 236 Debtor entities (.2).
B210	08/06/24	D. Simon	2.10	Conference with J. Decker and L. Halperin re case strategy matters (1.0); conference with J. Haake re Kissimmee matters (.3); multiple conferences with Synergy re open operational matters (.8).
B210	08/06/24	J. Haake	0.30	Conference with D. Simon re regulatory and operational issue (.3).
B210	08/06/24	J. Bishop Jones	4.00	Communications with MWE team (.3); file amended Schedule G for Debtors (84) (3.7).
B210	08/07/24	D. Northrop	2.30	File amended Schedule G for subset of Debtor entities (2.3).
B210	08/07/24	N. Rainey	5.30	Electronically file 80 amended Schedule G (5.3).
B210	08/07/24	D. Simon	0.30	Communications re Kissimmee (.3).
B210	08/07/24	J. Bishop Jones	2.50	Communications with MWE team (.3); file amended Schedule G for Debtors (35) (2.2).





LaVie Care Centers, LLC

Client: 120098  
Invoice: 3950364  
Invoice Date: 10/31/24

Task	Date	Name	Hours	Description
B210	08/13/24	E. Keil	1.20	Conference with B. Jones, J. Decker, et al. re status update (.2); conference with J. Brilliant re schedules amendment (.2); review same (.8).
B210	08/13/24	D. Simon	0.70	Multiple conferences with L. Halperin and J. Decker re business and restructuring strategies (.7).
B210	08/14/24	E. Keil	2.30	Conference with Ankura team re schedules and statements diligence (.5); prepare responses re UST diligence questions re same (1.5); conference with D. Simon re same (.3).
B210	08/19/24	D. Simon	0.50	Multiple conferences with E. Keil re various operational issues (.5).
B210	08/22/24	E. Keil	0.90	Conferences with L. Burton re schedule amendments (.3); correspondence with J. Brilliant re same (.2); conference with B. Jones, J. Decker, et al. re business operations (.4).
B210	08/23/24	E. Keil	0.50	Review Schedule G amendments (.3); correspondence with Verita re same (.2).
B210	08/26/24	J. Haake	0.30	Correspondence with R. Ahmed re employee issues (.3).
B210	08/26/24	D. Northrop	0.10	Communications with E. Keil re amended schedules to be filed for Debtors LaVie Care Centers, LLC, Alpha Health Care Properties, LLC and LV Operations II, LLC and filing fees associated with amendments to certain schedules (.1).
B210	08/26/24	E. Keil	1.30	Conference with R. Ahmed re MORs, vendor issues (.9); conference with B. Jones, R. Ahmed, et al. re status updates (.4).
B210	08/28/24	D. Northrop	1.60	File second amended and restated Schedule G for Debtor LV Operations II, LLC on the ECF case docket in Case No. 24-55506 (.2); review amended Schedule E/F, Part 2 for Debtor Alpha Health Care Properties, LLC and original Schedule E/F for Debtor Alpha Health Care Properties, LLC filed on 7/16/2024 (.2); correspondence with E. Keil re amendments to Schedule E/F for Debtor Alpha Health Care Properties, LLC (.2); file amended Schedule E/F, Part 2 for Debtor Alpha Health Care Properties, LLC (.4); pay filing fee for amended Schedule E/F for Debtor Alpha Health Care Properties, LLC (.3); review local Rule 2002-1 re



LaVie Care Centers, LLC

Client: 120098  
Invoice: 3950364  
Invoice Date: 10/31/24

Task	Date	Name	Hours	Description
				service of amended schedules on newly-scheduled creditors (.2); correspondence with E. Keil re same (.1).
B210	08/28/24	E. Keil	1.10	Conference with J. Brilliant, R. Ahmed re schedules amendments, MORs (1.1).
B210	08/29/24	D. Northrop	0.10	Review clerk's deficiency notice with respect to amended Schedule E/F, Part 2 filed on 8/28/2024 in the Alpha Health Care Properties, LLC case, and follow up correspondence with E. Keil re same (.1).
B210	08/29/24	E. Keil	0.50	Conference with B. Jones, R. Ahmed, et al. re status update (.5).
B210	08/30/24	D. Northrop	2.70	File amended monthly operating reports for June 2024 for three Debtor groups (.7); conference with E. Keil re reclassification of four Debtors from Group 3 to Group 1 for monthly reporting purposes and requesting the clerk's assistance in correcting docket entries for amended June MORs for Groups 1 and 3 (.1); file monthly operating reports for July 2024 for three Debtor groups (1.0); draft email to the clerk of the Bankruptcy Court for the Northern District of Georgia re correcting deficiency with respect to amended Schedule E/F filed by Debtor Alpha Health Care Properties, LLC (.3); correspondence with E. Keil re revising official Form 202 (declaration under Penalty of Perjury for Non-Individual Debtors) to be filed with amended summary of assets and liabilities for Debtor Alpha Health Care Properties, LLC, and guidance received from the clerk re filing amended summary of assets and liabilities (.3); review revised official Form 202 and correspondence with E. Keil re further revisions needed to the form (.1); file amended summary of assets and liabilities and related declaration for Debtor Alpha Health Care Properties, LLC (.2).
B210	08/30/24	E. Keil	0.70	Review MORs (.4); conference and correspondence with D. Northrop re filing of same (.3).
B210	08/31/24	D. Northrop	0.30	Draft correspondence to the clerk of the Bankruptcy Court requesting revisions to docket text for amended monthly operating reports for June 2024 for Group 1 and Group 3 Debtors, filed on



LaVie Care Centers, LLC

Client: 120098  
Invoice: 3950364  
Invoice Date: 10/31/24

Task	Date	Name	Hours	Description
				8/30/2024, to correctly reflect the case numbers of the Debtors included in each group (.2); review certificate of service prepared and filed by Verita Global relating to service of amended Schedule E/F for Debtor Alpha Health Care Properties, LLC (.1).
B220	08/22/24	J. Haake	0.60	Prepare for and conference with M. Blumen of AFSCME re status of case and CBAs (.6).
B230	08/08/24	J. Jumbeck	0.50	Review DIP credit agreement re termination events (.1); draft summary re same (.2); correspondence with MWE team re same (.2).
B230	08/22/24	E. Keil	0.60	Prepare notice of DIP amendments (.4); conference with R. Ahmed re same (.2).
B230	08/26/24	J. Jumbeck	1.80	Review Debtor-in-possession credit agreement (.4); draft amendment re same (1.4).
B230	08/26/24	E. Keil	0.30	Revise notice of revised DIP budget (.2); correspondence with Ankura team re same (.1).
B230	08/26/24	D. Northrop	0.10	Review notice of filing of revised DIP budget and prepare to file same, and communications with E. Keil re same (.1).
B230	08/30/24	D. Northrop	0.20	File notice of revised DIP budget (.2).
B240	08/05/24	D. Simon	0.50	Conference with G. Karch and M. Wilder re tax issues (.5).
B240	08/05/24	M. Wilder	0.50	Conference with G. Karch re COD planning with respect to Debtor entities (.5).
B240	08/05/24	G. Karch	0.70	Review status of tax issues, and conference re same with D. Simon and D. Snyder (.7).
B270	08/01/24	C. Lee	0.10	Correspond with counsel to utility provider re utilities inquiry (.1).
B270	08/02/24	C. Lee	0.20	Correspond with utilities provider re utilities inquiry (.2).
B270	08/05/24	J. Haake	0.20	Correspondence with R. Patella re utility issue (.2).
B270	08/12/24	J. Haake	0.30	Correspondence with K. Lehman re utilities issue (.3).
B270	08/19/24	R. Trickey	1.20	Draft adequate assurance letter agreement for UGI (1.1); correspond with J. Haake re same (.1).
B270	08/19/24	C. Lee	0.10	Correspond with Ankura team re utilities invoicing (.1).
B270	08/19/24	J. Haake	1.10	Correspondence with R. Patella re utility issues (.5); review adequate assurance agreement and correspondence with R. Trickey re same (.6).



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LaVie Care Centers, LLC

Client: 120098  
Invoice: 3950364  
Invoice Date: 10/31/24

Task	Date	Name	Hours	Description
B270	08/21/24	R. Trickey	1.10	Revise adequate assurance letter agreement (.9); correspond with J. Haake re same (.2).
B270	08/21/24	J. Haake	1.30	Revise adequate assurance utility agreement and correspondence with R. Trickey re same (1.3).
B270	08/22/24	J. Haake	1.60	Correspondence with R. Patella re utility issues and revise adequate assurance agreement (1.6).
B270	08/23/24	J. Haake	0.70	Revise draft agreement (.5); correspondence with A. Dalsass and R. Patella re utility issue (.2).
B280	08/13/24	E. Keil	0.50	Conference and correspondence with R. Jurbala re vendor issues (.5).
B280	08/14/24	J. Haake	1.00	Correspondence with J. Watson re CFS issues (.4); review revisions to draft settlement agreement and correspondence with L. Wolgast re same (.6).
B280	08/15/24	J. Haake	0.50	Prepare for and conference with L. Wolgast re settlement of vendor issue (.5).
B280	08/19/24	R. Trickey	0.70	Revise CFS stipulation motion (.7).
B280	08/22/24	J. Haake	1.00	Multiple conferences with J. Watson and J. Brilliant re vendor issues (.6); correspondence with L. Wolgast re same (.4).
B280	08/23/24	J. Haake	0.80	Revise draft side agreement and correspondence with L. Wolgast re vendor issue (.8).
B280	08/30/24	J. Haake	0.70	Correspondence with L. Wolgast, A. Lojek and J. Brilliant re vendor issues (.7).
B290	08/02/24	J. Haake	0.90	Conference with L. Williams re insurance issues (.6); correspondence with J. Brilliant re same (.3).
B290	08/05/24	J. Haake	0.20	Correspondence with D. Simon and E. Keil re insurance issues (.2).
B290	08/19/24	R. Smethurst	0.30	Correspondence with J. Haake re insurance question from LaVie (.3).
B290	08/21/24	J. Haake	2.30	Analyze insurance issues and conference with A. Spisak re same (2.3).
B290	08/21/24	J. Bishop Jones	0.20	Communications with J. Haake (.1); prepare policy documents for circulation (.1).
B290	08/22/24	J. Bishop Jones	0.30	Communications with J. Haake (.1); watermark insurance policies (.1); provide to J. Haake (.1).
B290	08/23/24	J. Haake	1.20	Analyze proposed lift stay stipulation and correspondence with N. Brannick re same (1.2).
B290	08/26/24	J. Haake	0.40	Correspondence with G. Hayes re insurance issues (.4).
B290	08/28/24	J. Haake	0.90	Analyze insurance and state litigation issues (.6);



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LaVie Care Centers, LLC

Client: 120098  
Invoice: 3950364  
Invoice Date: 10/31/24

Task	Date	Name	Hours	Description
B290	08/29/24	J. Haake	0.70	correspondence with R. Trickey re same (.3). Prepare for and participate in conference with J. Rezac re lift stay issue (.7).
B310	08/30/24	D. Simon	0.50	Multiple communications with claimants re proof of claim deadline (.5).
B320	08/01/24	R. Trickey	4.30	Conference with E. Keil and J. Haake re solicitation motion and ballots (1.1); conference with Verita team and J. Haake re same (.8); revise solicitation motion and ballots (2.4).
B320	08/01/24	J. Haake	3.00	Conference with R. Trickey re time line (.4); prepare for and conference with E. Keil and R. Trickey re plan solicitation issues (.9); prepare for and conference with Verita team re solicitation issues (1.1); correspondence and conference with R. Trickey re revisions to solicitation documents (.6).
B320	08/01/24	J. Jumbeck	0.70	Review draft of plan term sheet (.5); correspondence with D. Simon re same (.2).
B320	08/01/24	E. Keil	1.40	Correspondence with MWE team re solicitation procedures (.3); prepare for and conference with R. Trickey, J. Haake re same (1.1).
B320	08/01/24	D. Simon	1.00	Conference with DIP lenders re plan term sheet (1.0).
B320	08/02/24	J. Haake	1.20	Correspondence with R. Trickey re solicitation issues (.4); conference with E. Keil re same (.8).
B320	08/02/24	R. Trickey	0.40	Revise solicitation procedures motion and ancillaries (.3); correspond with E. Keil re same (.1).
B320	08/02/24	E. Keil	6.50	Revise solicitation procedures motion and related notices, ballots, and proposed order (5.4); conferences with R. Trickey, J. Haake re same (1.1).
B320	08/03/24	R. Trickey	0.10	Correspond with D. Simon re solicitation motion and ancillary materials (.1).
B320	08/03/24	D. Simon	1.00	Conference with F. Lawall re plan and discovery issues (.5); conference with B. Jones re same (.5).
B320	08/05/24	R. Trickey	0.60	Revise solicitation motion and ancillary documents (.5); correspond with E. Keil re same (.1).
B320	08/05/24	J. Jumbeck	1.50	Conference with E. Keil and D. Simon re draft chapter 11 plan updates (.4); review draft plan term sheet (.3); revise chapter 11 plan (.8).
B320	08/05/24	D. Simon	1.60	Conference with J. Jumbeck and E. Keil re plan issues (.5); conferences with J. Muenker re term



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LaVie Care Centers, LLC

Client: 120098  
Invoice: 3950364  
Invoice Date: 10/31/24

Task	Date	Name	Hours	Description
				sheet and related issues (1.1).
B320	08/05/24	E. Keil	3.00	Revise solicitation procedures motion and related exhibits (2.6); conference with D. Simon, J. Jumbeck re plan (.4).
B320	08/06/24	E. Keil	0.80	Revise solicitation procedures motion and related exhibits (.8).
B320	08/07/24	R. Trickey	0.20	Correspond with J. Haake and E. Keil re solicitation motion and ballots (.2).
B320	08/07/24	L. Foody	0.70	Research re [REDACTED] (.7).
B320	08/07/24	E. Keil	3.60	Revise solicitation procedures motion and related exhibits (1.9); prepare same for filing (.6); correspondence with KCC, D. Northrop re filing and service of same (.2); research re [REDACTED] (.9).
B320	08/07/24	D. Simon	0.70	Communications re plan term sheet (.7).
B320	08/08/24	J. Jumbeck	1.10	Revise draft chapter 11 plan and disclosure statement (1.1).
B320	08/08/24	L. Foody	3.10	Research re [REDACTED] (3.1).
B320	08/08/24	E. Keil	2.10	Research re [REDACTED] (2.1).
B320	08/08/24	D. Simon	2.70	Multiple conferences with Ankura team re waterfall and plan deliverables (1.2); multiple conferences with DIP lenders re plan issues and strategy (1.5).
B320	08/09/24	J. Jumbeck	2.10	Conference with D. Simon, Goodwin team, FBFK team, DLA team, and Troutman team re proposed plan structure (.5); continue to revise draft disclosure statement and plan (1.6).
B320	08/09/24	D. Northrop	0.10	Review objection to confirmation of plan and potential assignment of executory contracts filed by Carolina Rehabilitation & Surgical Associates, and correspondence with MWE team re same (.1).
B320	08/09/24	D. Simon	2.40	Numerous conferences with Committee and DIP lenders re plan term sheet (1.6); conferences with client re plan negotiations and settlement (.8).
B320	08/10/24	E. Keil	1.70	Research re [REDACTED] (1.7).
B320	08/12/24	J. Jumbeck	1.40	Continue to revise draft disclosure statement and plan (1.4).
B320	08/12/24	D. Simon	0.80	Conferences re plan negotiations and strategy (.8).
B320	08/13/24	J. Jumbeck	1.10	Review D. Simon comments to plan term sheet (.2); revise same (.9).





**McDermott  
Will & Emery**

LaVie Care Centers, LLC

Client: 120098  
Invoice: 3950364  
Invoice Date: 10/31/24

Task	Date	Name	Hours	Description
B320	08/13/24	D. Simon	2.80	Plan negotiations with DIP lenders (2.8).
B320	08/14/24	J. Jumbeck	2.60	Continue to revise plan term sheet (1.9); correspondence with MWE team re same (.2); conference with DLA team, FBFK team, D. Simon, and Ankura team re plan waterfall (.5).
B320	08/14/24	E. Keil	2.70	Review plan confirmation objection (.9); research re [REDACTED] (1.8).
B320	08/14/24	C. Lee	0.20	Review and analyze Recovery Corp.'s plan objection (.2).
B320	08/14/24	D. Simon	2.30	Conference with Ankura re waterfall (.7); conferences with DIP lenders re plan strategy and negotiations (.6); conference with F. Lawall re Committee plan issues (.7); conferences with L. Halperin re same (.3).
B320	08/14/24	T. Cramton	0.80	Preliminary review and analysis of Recovery Corp. plan objection (.8).
B320	08/15/24	J. Jumbeck	4.10	Conference with D. Simon and E. Keil re draft plan term sheet (.5); revise same (1.4); conference with PR team and D. Simon re plan status (.3); revise chapter 11 plan and disclosure statement (1.9).
B320	08/15/24	E. Keil	3.80	Research re [REDACTED] (1.2); conference re same with J. Jumbeck and D. Simon (.5); draft DS language re same (.4); draft exclusivity motion (1.7).
B320	08/15/24	T. Cramton	0.50	Review and analyze Recovery Corp.'s plan objection filing (.5).
B320	08/16/24	J. Jumbeck	3.70	Conference with FBFK team, DLA team, Chapman team, Goodwin team, and D. Simon re plan status (.6); conference with GDC team, Polsinelli team, and D. Simon re same (.7); revise plan term sheet (.5); review D. Simon comments re same (.3); revise same (.4); correspondence with MWE team re same (.3); correspondence with DIP lender team re same (.1); revise draft disclosure statement and plan (.8).
B320	08/16/24	D. Simon	3.50	Multiple conferences with J. Muenker and DIP lenders re plan proposal and next steps (1.4); conference with Welltower re same (.5); analyze issues relating to plan structures (1.6).
B320	08/17/24	D. Simon	0.30	Conference with J. Muenker re plan term sheet issues (.3).





**McDermott  
Will & Emery**

LaVie Care Centers, LLC

Client: 120098  
Invoice: 3950364  
Invoice Date: 10/31/24

Task	Date	Name	Hours	Description
B320	08/18/24	E. Keil	1.30	Research re [REDACTED] (1.3).
B320	08/18/24	D. Simon	2.00	Conference with Ankura re waterfall analysis (1.3); conferences with DIP lenders re plan term sheet issues (.7).
B320	08/19/24	J. Jumbeck	2.30	Conference with MWE team, Chapman team, and Ankura team re waterfall analysis (.6); continue to revise draft disclosure statement and plan (1.7).
B320	08/19/24	E. Keil	2.30	Research re [REDACTED] (1.5); conference with B. Jones, R. Ahmed, et al. re waterfall (.8).
B320	08/19/24	D. Simon	1.20	Conference with Chapman and J. Decker re waterfall (.6); review case law re substantive consolidation (.6).
B320	08/20/24	J. Jumbeck	6.20	Continue to revise combined disclosure statement and plan (6.2).
B320	08/20/24	E. Keil	1.40	Conference with B. Jones, R. Ahmed, et al. re waterfall (.9); draft confirmation objection summary chart (.5).
B320	08/20/24	D. Simon	0.60	Conference with DIP lenders re waterfall (.6).
B320	08/21/24	E. Keil	1.20	Revise confirmation objection chart (1.2).
B320	08/21/24	J. Jumbeck	4.10	Continue to revise combined plan and disclosure statement (4.1).
B320	08/21/24	D. Simon	1.60	Multiple conferences with plan sponsor re term sheet and plan bid (1.6).
B320	08/21/24	N. Bull	0.80	Review waterfall presentation (.4); review confirmation objection (.4).
B320	08/22/24	J. Jumbeck	2.80	Continue to revise combined disclosure statement and plan (2.8).
B320	08/22/24	D. Simon	2.40	Numerous conferences and communications re term sheet and plan issues (2.4).
B320	08/23/24	J. Jumbeck	5.80	Continue to revise combined disclosure statement and plan (5.8).
B320	08/23/24	D. Simon	3.60	Multiple conferences with Ankura re plan and DS workstreams (1.3); multiple conferences with DIP lenders re plan term sheet and related issues (.8); conference with Committee re waterfall (.5); multiple communications with Committee and court re mediation and settlement matters (.6); conferences with J. Decker and Chapman re same (.4).
B320	08/23/24	E. Keil	1.20	Conference with D. Kovsky, F. Lawall, et al. re



LaVie Care Centers, LLC

Client: 120098  
Invoice: 3950364  
Invoice Date: 10/31/24

Task	Date	Name	Hours	Description
				waterfall analysis (.5); conference with B. Jones, R. Ahmed re same (.7).
B320	08/24/24	J. Haake	0.40	Analyze plan issue and correspondence with D. Simon re same (.4).
B320	08/24/24	D. Simon	2.50	Analyze plan issues (.8); review and revise plan/DS (1.7).
B320	08/25/24	D. Simon	2.30	Review and revise plan (2.3).
B320	08/26/24	J. Haake	0.90	Review plan term sheet and revisions to plan (.7); conference with J. Jumbeck re same (.2).
B320	08/26/24	D. Simon	4.30	Review and revise plan (3.0); multiple conferences with DIP lenders re plan and term sheet matters (1.3).
B320	08/26/24	D. Northrop	0.80	Review joint motion for order authorizing and directing mediation (.1); file joint motion and proposed order (.2); upload proposed order authorizing and directing mediation (.1); review order authorizing and directing mediation upon entry by the court, and correspondence with MWE team re same (.1); review Debtors' notice of continued disclosure statement hearing and sale hearing (.2); file notice on the ECF case docket (.1).
B320	08/26/24	J. Haims	0.30	Review plan term sheet (.3).
B320	08/27/24	J. Haake	7.80	Review and revise combined plan and disclosure statement (4.2); correspondence and conferences with R. Trickey and E. Keil re plan and solicitation issues (1.1); revise solicitation documents and correspondence with R. Trickey re same (.9); make additional revisions to plan to incorporate comments from D. Simon (1.6).
B320	08/27/24	R. Trickey	0.90	Revise plan solicitation materials (.9).
B320	08/27/24	D. Northrop	0.20	Review objection of Jacksonville Nursing Home, LTD. to notice to contract parties and Debtors' joint chapter 11 plan of reorganization (.1); correspondence with MWE team re same (.1).
B320	08/27/24	D. Simon	1.70	Review and revise plan (1.3); communications with E. Keil and J. Haake re same (.4).
B320	08/27/24	E. Keil	2.00	Conference with J. Haake, D. Simon re plan revisions (.9); review and revise same (1.1).
B320	08/27/24	J. Haims	0.70	Review and analyze draft plan term sheet (.7).
B320	08/28/24	D. Simon	3.00	Revise plan (1.3); conference with DIP lenders re



**McDermott  
Will & Emery**

LaVie Care Centers, LLC

Client: 120098  
Invoice: 3950364  
Invoice Date: 10/31/24

Task	Date	Name	Hours	Description
B320	08/29/24	R. Trickey	0.90	same (1.4); conference with Omnicare re same (.3). Conference with J. Haake re solicitation notices (.1); revise solicitation materials to reflect adjusted timeline and additional disclosure (.8).
B320	08/29/24	J. Haake	2.10	Review draft ballots and conference with R. Trickey re revisions to ballots to incorporate comments from US Trustee (.9); revise draft plan to incorporate information requested by US Trustee (1.2).
B320	08/29/24	E. Keil	0.40	Conference with J. Adams re disclosure statement, plan (.4).
B320	08/29/24	D. Simon	1.70	Conference with UST re plan (.5); conferences with plan sponsor re plan and related matters (1.2).
B320	08/30/24	D. Northrop	0.10	Review objection of Cigna to Debtors' disclosure statement, and correspondence with MWE team re same (.1).
B320	08/30/24	J. Haake	0.40	Revise plan and correspondence with D. Simon re same (.4).
B320	08/30/24	D. Simon	0.40	Multiple conferences with DIP lenders re plan sponsor transaction (.4).
B430	08/01/24	L. Barrett	0.40	Review and revise investigation presentation (.4).
B430	08/01/24	C. Zhu	1.00	Review interview memos and draft search terms (1.0).
B430	08/02/24	J. Haims	1.00	Correspondence with MWE investigation team re claims analysis, Committee investigation, draft presentation, Synergy document production, and strategy (1.0).
B430	08/02/24	C. Zhu	0.40	Draft proposed search terms (.4).
B430	08/02/24	N. Fomba	2.50	Correspond with team re internal investigation, and review documents pertaining to legal analysis (2.5).
B430	08/05/24	J. Haims	2.00	Correspondence with MWE investigation team re claims analysis, Committee investigation, draft presentation, Synergy document production, and strategy (1.0); research (.5); work on draft investigation presentation (.5).
B430	08/05/24	C. Zhu	0.40	Review presentation slides (.4).
B430	08/05/24	L. Barrett	1.90	Research [REDACTED] (.8); review and revise investigation presentation re same (1.1).
B430	08/06/24	J. Haims	2.30	Correspondence with MWE investigation team re claims analysis, Committee investigation, draft presentation, Synergy document production, and



LaVie Care Centers, LLC

Client: 120098  
Invoice: 3950364  
Invoice Date: 10/31/24

Task	Date	Name	Hours	Description
				strategy (1.5); work on draft investigation presentation (.8).
B430	08/06/24	L. Barrett	0.10	Review correspondence with MWE litigation team re presentation (.1).
B430	08/06/24	C. Zhu	0.80	Review and revise presentation slides (.8).
B430	08/07/24	J. Haims	2.50	Correspondence with MWE investigation team re claims analysis, Committee investigation, draft presentation, Synergy documents, and strategy (1.5); work on draft investigation presentation (1.0).
B430	08/07/24	H. Udow	3.70	Conference with MWE team re strategy and next steps (.3); revise investigation presentation (3.4).
B430	08/07/24	C. Zhu	9.90	Review and revise presentation slides (9.9).
B430	08/07/24	N. Fomba	2.30	Participate in weekly conference with investigation and litigation team (.5); correspond with team re legal analysis and revise presentation (1.8).
B430	08/07/24	L. Barrett	0.30	Participate in weekly cross teams conference (.3).
B430	08/08/24	N. Fomba	1.50	Correspond with C. Zhu re legal analysis presentation (.5); review presentation and incorporate edits (1.0).
B430	08/08/24	J. Haims	4.00	Correspondence with MWE investigation team re claims analysis, Committee investigation, draft presentation, Synergy documents, and strategy (1.5); work on and research [REDACTED] (2.5).
B430	08/08/24	H. Udow	2.80	Conference with J. Haims and C. Zhu re revisions to presentation (1.0); revise presentation (1.8).
B430	08/08/24	N. Bull	1.00	Conference with MWE team and client re investigation (1.0).
B430	08/08/24	C. Zhu	7.60	Review and revise presentation slides (7.6).
B430	08/08/24	L. Barrett	0.30	Review, analyze, comment on presentation (.3).
B430	08/09/24	H. Udow	1.00	Conference with MWE investigation team re presentation (1.0).
B430	08/09/24	J. Haims	4.00	Correspondence with MWE investigation team re claims analysis, Committee investigation, draft presentation, Synergy documents, and strategy (1.5); work on and research [REDACTED] (2.5).
B430	08/09/24	L. Barrett	1.00	Participate in conference with MWE internal investigation team re internal investigation presentation (1.0).



LaVie Care Centers, LLC

Client: 120098  
Invoice: 3950364  
Invoice Date: 10/31/24

Task	Date	Name	Hours	Description
B430	08/09/24	C. Zhu	1.80	Participate in meeting with MWE team re presentation slides (1.0); review and revise slides (.8).
B430	08/09/24	N. Fomba	5.50	Research [REDACTED] (3.5).
B430	08/10/24	N. Fomba	4.50	Legal research [REDACTED] (3.0); update legal analysis representation (1.5).
B430	08/11/24	J. Haims	1.00	Work on and research draft investigation presentation (1.0).
B430	08/11/24	N. Fomba	1.00	Review presentation and correspond with J. Haims and team re updated draft (1.0).
B430	08/12/24	J. Haims	2.00	Work on and research draft investigation presentation, and correspondence re same (2.0).
B430	08/12/24	C. Zhu	0.30	Review and revise presentation slides (.3).
B430	08/12/24	N. Fomba	2.50	Conference with J. Haims re internal investigation and edits to legal analysis presentation (.5); review presentation and incorporate edits (2.0).
B430	08/13/24	J. Haims	3.50	Correspondence with MWE investigation team re claims analysis, Committee investigation, draft presentation, Synergy documents, and strategy (1.5); work on and research draft investigation presentation (2.0).
B430	08/13/24	C. Zhu	0.30	Revise and finalize presentation slides (.3).
B430	08/14/24	J. Haims	1.50	Correspondence with MWE investigation team re investigation, Committee interviews, document production and review, and strategy (1.5).
B430	08/14/24	C. Zhu	0.20	Participate in weekly meeting (.2).
B430	08/14/24	N. Bull	1.00	Review investigation summary and comments (1.0).
B430	08/15/24	J. Haims	1.60	Correspondence with MWE investigation team re investigation, Committee interview, document production and review, and strategy (.8); correspondence re draft presentation (.8).
B430	08/15/24	C. Zhu	2.20	Participate in Committee interview (2.2).
B430	08/15/24	N. Bull	1.50	Participate in informal interview with management, Synergy counsel, MWE and the Committee (1.5).
B430	08/16/24	J. Haims	0.70	Correspondence with MWE investigation team re investigation, draft presentation, Committee interview, document production and review, and strategy (.7).





LaVie Care Centers, LLC

Client: 120098  
Invoice: 3950364  
Invoice Date: 10/31/24

Task	Date	Name	Hours	Description
B430	08/17/24	J. Haims	0.50	Correspondence with MWE investigation team re investigation, draft presentation, Committee interview, document production and review, and strategy (.5).
B430	08/18/24	J. Haims	0.50	Correspondence with MWE investigation team re investigation, draft presentation, Committee interview, document production and review, and strategy (.5).
B430	08/19/24	J. Haims	2.50	Research in [REDACTED] and correspondence re investigation, draft presentation, Committee interview, document production and review, and strategy (2.5).
B430	08/20/24	J. Haims	2.50	Research in [REDACTED] and correspondence re investigation, draft presentation, document production and review, and strategy (2.5).
B430	08/20/24	C. Zhu	0.60	Review and revise notes from Committee interview (.6).
B430	08/20/24	L. Barrett	0.50	Conference with D. Simon re [REDACTED] (.4); research re same (.1).
B430	08/21/24	J. Haims	2.00	Research in [REDACTED] and correspondence re investigation, draft presentation, document production and review, and strategy (2.0).
B430	08/21/24	C. Zhu	6.20	Participate in cross-team meeting (.3); review notes from Committee interview and draft memo (5.9).
B430	08/21/24	N. Fomba	3.70	Participate in weekly team conference and conference with J. Haims re next steps in investigation (1.1); review loan documents (2.6).
B430	08/21/24	L. Barrett	0.40	Participate in weekly cross team coordination conference (.4).
B430	08/22/24	J. Haims	2.00	Research in [REDACTED] and correspondence re investigation, draft presentation, document production and review, and strategy (1.5); review draft interview memo (.5).
B430	08/22/24	C. Zhu	3.20	Participate in meeting with J. Haims and C. Fomba re next steps (.3); draft Committee interview memo (2.9).
B430	08/22/24	L. Barrett	0.10	Research re [REDACTED] (.1).
B430	08/23/24	J. Haims	1.50	Research in [REDACTED] and correspondence re investigation, draft presentation, document production and review, and strategy (1.5).



LaVie Care Centers, LLC

Client: 120098  
Invoice: 3950364  
Invoice Date: 10/31/24

Task	Date	Name	Hours	Description
B430	08/24/24	J. Haims	0.50	Correspondence with MWE investigation team re investigation, draft presentation, document production and review, and strategy (.5).
B430	08/25/24	J. Haims	0.50	Correspondence with MWE investigation team re investigation, draft presentation, document production and review, and strategy (.5).
B430	08/25/24	N. Fomba	1.80	Review Committee requests (.8); review updates to bankruptcy docket (1.0).
B430	08/26/24	J. Haims	2.00	Research in [REDACTED] and correspondence re investigation, draft presentation, document production and review, and strategy (1.5); review Committee information requests (.5).
B430	08/26/24	N. Fomba	6.00	Review documents pertaining to loan agreements (2.5); draft narrative re same (1.5); review bankruptcy docket (2.0).
B430	08/26/24	L. Barrett	4.90	Research re [REDACTED] (4.9).
B430	08/27/24	J. Haims	3.80	Research in [REDACTED] and correspondence re investigation, draft presentation, document production and review, and strategy (2.3); legal research re investigation (.8); conference with Aspire counsel and correspondence re investigation (.7).
B430	08/27/24	C. Zhu	0.40	Review documents relating to prepetition loans (.4).
B430	08/27/24	L. Barrett	0.30	Correspond with D. Simon re [REDACTED] research (.3).
B430	08/27/24	N. Fomba	4.70	Review all interview memos, org chart, first day declaration and other internal documents (2.7); draft narrative pertaining to key issues in case (2.0).
B430	08/28/24	J. Haims	6.00	Research [REDACTED] and correspondence re same, document production and review, and strategy (6.0).
B430	08/28/24	C. Lee	4.40	Research legal issues re [REDACTED] (1.1); review and analyze case law re same (1.8); summarize findings re same (.6); correspond with D. Simon and MWE team re same (.1); conference with H. Putre re same (.2); conference with D. Simon and MWE team re same (partial) (.6).
B430	08/28/24	N. Fomba	4.00	Continue to review documents re issues reviewed in investigation (3.5); correspond with J. Haims and E. Keil re same (.5).





**McDermott  
Will & Emery**

LaVie Care Centers, LLC

Client: 120098  
Invoice: 3950364  
Invoice Date: 10/31/24

Task	Date	Name	Hours	Description
B430	08/29/24	J. Haims	4.00	Research in [REDACTED] and correspondence re same, document production and review, and strategy (3.0); review and revise draft interview memorandum (1.0).
B430	08/29/24	C. Lee	3.50	Research and analyze legal issues re [REDACTED] (3.5).
B430	08/29/24	C. Zhu	1.40	Review and revise Committee interview memo (1.4).
B430	08/30/24	J. Haims	3.50	Research in [REDACTED] and correspondence re same, claim analyses, document production and review, and strategy (3.5).
B430	08/30/24	C. Lee	3.40	Research legal issues re [REDACTED] (.6); review and analyze case law re same (2.4); correspond with E. Keil and MWE team re same (.4).
B430	08/30/24	C. Zhu	2.60	Research and summarize issue re [REDACTED] (2.6).
B430	08/30/24	C. Clear	3.30	Review and prepare timeline slides (3.3).
B430	08/31/24	J. Haims	0.50	Research in [REDACTED] and correspondence re same, claim analyses, and strategy (.5).
B460	08/21/24	R. Higgins	0.10	Analyze questions re privacy and production (.1).
B460	08/22/24	R. Higgins	0.30	Conference with T. Cramton re privacy issues and information production (.3).
B470	08/01/24	T. Cramton	2.00	Review Committee counsel 2004 request redline proposal (.5); meet and confer with Committee counsel and Omega counsel, including debrief with N. Bull and E. Keil (1.0); review transcript of July 31 hearing on 2004 motion (.3); run preliminary search terms on document collection to determine scope and report same to N. Bull (.2).
B470	08/01/24	D. Valentino	1.80	Process email data and promote documents for attorney review (.8); resolve technical issues (.2); conduct final QC (.3); update search index (.2); update search term reports (.3).
B470	08/01/24	N. Bull	3.10	Meet and confer with Committee and Omega re 2004 discovery (.8); review Committee's proposed revised discovery (.5); conferences and correspondence with D. Simon and E. Keil re same (1.0); revise disclosure document (.5); revise joint language to court (.3).



**McDermott  
Will & Emery**

LaVie Care Centers, LLC

Client: 120098  
Invoice: 3950364  
Invoice Date: 10/31/24

Task	Date	Name	Hours	Description
B470	08/01/24	E. Keil	2.10	Conference with N. Bull re 2004 requests (.4); conference with same re UCC revisions to 2004 requests (.5); conference with D. Kovsky, F. Lawall re same (.6); conference with T. Cramton, N. Bull re same (.4); review and revise same (.2).
B470	08/02/24	T. Cramton	0.20	Attention to emails with opposing counsel and chambers on appearances and entry of 2004 discovery order (.2).
B470	08/02/24	E. Kwon	0.40	Identify potentially relevant emails for case development review (.2); prepare report re same (.1); review ESI protocol for adherence (.1).
B470	08/02/24	B. Paulsen	3.10	Review and analyze case law and statute for Delaware law re fiduciary duties by Board members of ultimate shareholders to held entities (3.1).
B470	08/02/24	N. Bull	0.50	Conferences with D. Simon re discovery (.5).
B470	08/04/24	N. Bull	0.50	Correspondence with MWE team and J. Anthony re discovery (.5).
B470	08/05/24	T. Cramton	4.50	Review and analyze initial hit report from Committee proposed search terms (.5); conference with N. Bull re proposed modifications on terms to narrow hits (.5); conference with N. Bull, E. Keil, and E. Kwon to discuss questions on same (.5); conference with D. Simon on Relativity issues (.1); review and analyze updated hit report as modified (.4); meet and confer with Synergy counsel on email discovery, including debrief with N. Bull (1.0); additional analysis of search term hits, including running own searches (1.0); follow up conference with N. Bull re Synergy email issues and MWE proposal (.5).
B470	08/05/24	E. Kwon	0.80	Identify proposed search term documents for potential review (.8).
B470	08/05/24	B. Paulsen	1.30	Revise power point presentation slides re breach of fiduciary duty (1.3).
B470	08/05/24	N. Bull	5.00	Conferences with J. Anthony and D. Simon re adversary proceeding (1.5); revise search terms and conferences with MWE team re same (1.0); conferences and emails with Synergy counsel, T. Cramton and D. Simon re discovery (2.5).
B470	08/06/24	N. Bull	3.50	Conference with J. Haims and D. Simon re



LaVie Care Centers, LLC

Client: 120098  
Invoice: 3950364  
Invoice Date: 10/31/24

Task	Date	Name	Hours	Description
				investigation (1.0); conferences and correspondence with J. Decker and MWE team re discovery workstreams (1.0); conferences with Synergy counsel, D. Simon and T. Cramton re discovery (1.5).
B470	08/06/24	T. Cramton	3.30	Review first-day filings and MWE presentations for background/search term info (.8); review hearing transcripts (.5); review and analyze updated hit reports, including conference with N. Bull on same (1.0); target searches of Synergy doc collection to determine scope and potential issues with email collection (1.0).
B470	08/06/24	B. Paulsen	1.10	Further review and analysis re fiduciary duties owed by parent entity to subsidiary (1.1).
B470	08/07/24	T. Cramton	8.50	Review and analyze Recovery Corp.'s motion to dismiss/convert and related discovery requests (3.0); conferences with N. Bull and E. Keil re same (1.0); review and analyze proposed search term hit reports and comparisons, including emails with N. Bull and E. Kwon on same (1.0); conference with Committee counsel on ESI protocols, search terms, Recovery Corp.'s motion and discovery requests, and related issues (1.0); prepare draft protective order and circulate internally with comments (1.5); additional discovery-related conferences and emails with MWE team re emails (1.0).
B470	08/07/24	C. Lee	4.20	Research legal issues re [REDACTED] (3.6); summarize findings re same (.5); correspond with E. Keil and MWE team re same (.1).
B470	08/07/24	E. Kwon	1.50	Identify proposed search term documents for potential review and prepare report re same (1.1); conference with T. Cramton re same (.2); review ESI protocol for adherence (.2).
B470	08/07/24	N. Bull	4.60	Meet and confer with Committee counsel and related conferences and correspondence with MWE team and Synergy counsel (2.0); internal conference with MWE team re developments (.3); conferences with D. Simon re discovery and strategy (1.0); review Committee bylaws (.4); review draft protective order (.4); review documents (.5).



LaVie Care Centers, LLC

Client: 120098  
Invoice: 3950364  
Invoice Date: 10/31/24

Task	Date	Name	Hours	Description
B470	08/08/24	D. Valentino	1.00	Promote saved search and promote to review unpromoted docs for attorney review (.5); conduct final QC (.1); update search index (.2); update search term reports (.2).
B470	08/08/24	T. Cramton	5.50	Participate in discovery meet and confer with Committee and Synergy counsel, including prep for same and running proposed search terms/comparing results (1.5); additional review and analysis of Recovery Corp.'s motion to dismiss/convert, including related discovery requests (1.5); conference with MWE team re same (1.0); prepare discovery request response matrix and send to D. Simon and N. Bull with comments (1.5).
B470	08/08/24	E. Kwon	0.20	Coordinate preparing additional UCC data room documents for case development review in the discovery document repository (.2).
B470	08/08/24	B. Paulsen	2.10	Further attention to power point presentation and related research following additional questions from J. Haims (2.1).
B470	08/08/24	N. Bull	1.00	Prepare for and meet and confer with Committee counsel (1.0).
B470	08/09/24	D. Valentino	0.80	Process EDOCS data and promote documents for attorney review (.4); resolve technical issues and conduct final QC (.2); update search index and update search term reports (.2).
B470	08/09/24	N. Bull	4.50	Conferences and emails with MWE team and independent director re strategy and Committee (1.5); conferences and emails with MWE team, J. Anthony and Committee re motion to dismiss and discovery (1.5); review legal research re same (.5); review motion to dismiss discovery and related papers (1.0).
B470	08/09/24	T. Cramton	2.00	Meet and confer with Recovery Corp., including follow up conference with N. Bull and E. Keil (1.0); review notes/E. Keil summary and prep draft email for Recovery Corp. counsel, including follow up on same (1.0).
B470	08/11/24	N. Bull	1.00	Conference and emails with D. Simon re litigation strategy (1.0).
B470	08/12/24	N. Bull	3.00	Conference with Synergy and Omega counsel re



LaVie Care Centers, LLC

Client: 120098  
Invoice: 3950364  
Invoice Date: 10/31/24

Task	Date	Name	Hours	Description
				discovery (.5); review comments to draft protective order (.5); correspondence and conferences with MWE team re discovery and motion to dismiss (2.0).
B470	08/12/24	B. Paulsen	0.50	Revise slides relating to fiduciary duties following further edits from D. Baker (.5).
B470	08/13/24	H. Putre	1.00	Confer with N. Bull and M. Khurana re background and issues for document review further to impending production, and initiate project attorney team involvement re same (1.0).
B470	08/13/24	M. Khurana	0.70	Participate in conference with N. Bull and H. Putre re strategy for upcoming production of documents, and review same (.7).
B470	08/13/24	N. Bull	4.60	Conferences and correspondence with MWE team and client re discovery and strategy (2.5); review protective order comments (.6); review third party discovery (.6); correspondence with Recovery Corp. re discovery (.4); review third party discovery (.5).
B470	08/14/24	H. Putre	0.20	Confer with discovery team re onboarding team for document review project further to impending production to unsecured creditors Committee (.2).
B470	08/14/24	T. Cramton	3.50	Review correspondence from Recovery Corp. counsel re discovery requests (.2); follow up on N. Bull correspondence with action items and document review plan (.3); conference with N. Bull re same and updates from meet and confer with Recovery Corp. counsel, including follow up on same (.5); conference with N. Bull and E. Keil re priv screen and analysis of Recovery Corp.'s motion to dismiss and plan objection (.5); prepare initial draft of review protocol (2.0).
B470	08/14/24	E. Kwon	1.10	Identify potentially privileged documents and prepare report re same (.9); coordinate project attorney review kick off (.2).
B470	08/14/24	C. Gelat	0.30	Follow up with discovery team re upcoming document review (.3).
B470	08/14/24	N. Bull	4.50	Prepare for and meet and confer with Committee and Recovery Corp. re discovery (1.0); review discovery requests (.5); conferences and correspondence with client and MWE team re



LaVie Care Centers, LLC

Client: 120098  
Invoice: 3950364  
Invoice Date: 10/31/24

Task	Date	Name	Hours	Description
				discovery and diligence questions (3.0).
B470	08/15/24	B. Casten	0.50	Draft a review budget estimate to assist the case team with predicting and controlling costs (.5).
B470	08/15/24	C. Gelat	1.20	Draft email to case team with preliminary questions re review (.4); conference with case team re upcoming document review (.3); coordinate project attorneys for upcoming document review (.5).
B470	08/15/24	H. Putre	0.50	Confer with discovery team re onboarding team for document review project further to impending production to unsecured creditors Committee (.5).
B470	08/15/24	T. Cramton	6.60	Complete initial draft of review protocol and send to N. Bull with comments (3.5); prepare and send email re document collection/review/production process for Synergy counsel, and send to N. Bull for comment and review (.5); review and analyze Recovery Corp. counsel's email with assertions re discovery for discussion with N. Bull (.5); conference with MWE e-discovery consultant re doc review protocol/process (.5); conference with N. Bull re case strategy and claims analysis (1.0); preliminary review of N. Bull comments and revisions on review protocol (.6).
B470	08/15/24	N. Bull	3.90	Conferences with client and MWE team re litigation strategy (.5); conferences and correspondence with MWE team re discovery (1.0); revise review protocol (1.5); draft discovery letter to Synergy (.5); correspondence with opposing counsel re hearing and discovery (.4).
B470	08/16/24	H. Putre	0.20	Review correspondence re document review and impending production (.2).
B470	08/16/24	C. Gelat	3.50	Follow up with technology project manager to prepare database for review, including method of review (.7); follow up with case team re review protocol, including responsiveness and privilege designations (.2); prepare first and second level review layouts based on case team feedback (.3); draft email to technology project manager with updated layouts, list views and review set information (.5); prepare spreadsheet of attorney and firm names to include in review protocol (.5);





LaVie Care Centers, LLC

Client: 120098  
Invoice: 3950364  
Invoice Date: 10/31/24

Task	Date	Name	Hours	Description
				review and analyze protocol, and update same with project attorney and privilege guidelines (1.1); confirm database is updated with privilege STR terms and persistent highlighting (.2).
B470	08/16/24	T. Cramton	3.30	Complete doc review protocol (2.3); letter to DLA re review process (.3); respond to review protocol questions, plus related emails with N. Bull (.4); respond to MWE e-discovery questions with updated review protocol, plus correspondence on same re scheduling training session with review team (.3).
B470	08/16/24	E. Kwon	2.70	Assist with preparing for project attorney document indexing review (1.1); identify redundant emails to exclude from the indexing project to reduce review costs (.5); set up indexing review work flow in the discovery document repository (1.1).
B470	08/16/24	N. Bull	3.40	Revise discovery letter (.4); revise review protocol (1.0); correspondence with MWE team re discovery and strategy (2.0).
B470	08/17/24	N. Bull	1.00	Conference with MWE team re discovery and strategy (.5); correspondence with MWE team, Committee and Omega re discovery (.5).
B470	08/18/24	T. Cramton	2.10	Review and revise updated review protocol, then finalize and circulate same (2.0); related correspondence with MWE team re same (.1).
B470	08/18/24	N. Bull	0.50	Correspondence with MWE team re discovery (.5).
B470	08/19/24	C. Gelat	9.20	Review case training material (1.0); case training with project attorneys (1.5); answer project attorney questions (1.3); follow up with technology project manager re access to case documents and review center (.3); follow up with case team re quality control work-flow and privilege review (.3); prepare privilege review template and send to case team for feedback (.3); prepare spreadsheet of review set tracker, including documents excluded based on privilege hits and non-inclusive emails and hard tag review set in database (.5); draft email to technology project manager re removing non-inclusive privilege hits plus families and preparing privilege review template in database (.2); perform targeted searches





LaVie Care Centers, LLC

Client: 120098  
Invoice: 3950364  
Invoice Date: 10/31/24

Task	Date	Name	Hours	Description
				based on documents reviewed by project attorneys and identify inconsistent responsiveness designations (.7); download sample documents and draft email to case team requesting feedback re same (.5); discuss case team feedback with project attorneys and upload sample documents to database for project attorney review and reference (.5); prepare question and answer spreadsheet and upload to database (.5); prepare metrics spreadsheet and provide results to case team (.5); draft email to discovery team member re outstanding items to discuss with project attorneys (.3); run targeted searches in project attorney review set for potentially privileged documents and provide results to case team (.3); review case team email re project attorney review and provide in-line comments re same (.5).
B470	08/19/24	H. Putre	1.80	Review correspondence re document review and review the manual/protocol re same (.4); conference with project attorney team re onboarding and document review briefing (1.4).
B470	08/19/24	T. Cramton	6.80	Run review training session, including related prep and follow up (3.0); review and respond to review team questions on responsiveness and privilege (1.0); preliminary review of 1L review set and 1L priv set, including related emails with MWE e-discovery (2.0); conference with N. Bull to discuss update on review and next steps, including follow up emails with MWE team to schedule meeting for same (.3); conference with E. Keil re follow-up questions based on same and related doc review (.5).
B470	08/19/24	E. Kwon	2.80	Assist with preparing for project attorney document indexing review (1.7); set up potentially privileged document indexing review work flow in the discovery document repository (1.1).
B470	08/19/24	R. Crooks	6.80	Participate in orientation for case information and document review criteria and practices (1.5); review and analyze emails for responsiveness and privilege in response to UCC request (5.3).
B470	08/19/24	G. Rutherford	7.50	Review and analyze emails for responsiveness and



LaVie Care Centers, LLC

Client: 120098  
Invoice: 3950364  
Invoice Date: 10/31/24

Task	Date	Name	Hours	Description
				privilege in response to UCC request (5.0); participate in orientation for case information and document review criteria and practices (1.0); participate in orientation for case information and document review criteria and practices (1.5).
B470	08/19/24	M. Khurana	1.20	Participate in orientation for case information and document review criteria and practices (1.2).
B470	08/19/24	T. Terrell	7.00	Participate in orientation for case information and document review criteria and practices (1.5); review and analyze emails for responsiveness and privilege in response to UCC request (5.5).
B470	08/19/24	J. Goebel	6.80	Participate in orientation for case information and document review criteria and practices (1.5); review and analyze emails for responsiveness and privilege in response to UCC request (5.3).
B470	08/19/24	V. Norwood	2.00	Participate in document review case training with T. Cramton, H. Putre, C. Gelat, and project attorneys (1.5); review case background materials, including document review manual (.5).
B470	08/19/24	N. Bull	3.20	Conference with D. Simon and J. Haims re litigation strategy (1.2); conferences and correspondence with MWE team re discovery (1.0); review discovery (1.0).
B470	08/19/24	D. Hope	6.60	Participate in orientation for case information and document review criteria and practices (2.2); review and analyze emails for responsiveness and privilege in response to UCC request (4.4).
B470	08/20/24	G. Rutherford	8.50	Review and analyze emails for responsiveness and privilege in response to UCC request (8.5).
B470	08/20/24	H. Putre	1.80	Review correspondence re document review workstreams and queries (.3); conference with case team re document review and production game plan (.4); confer with M. Khurana and T. Cramton re responsiveness queries (.2); review, analyze, and code documents in QC review set (.9).
B470	08/20/24	T. Terrell	7.50	Review and analyze emails for responsiveness and privilege in response to UCC request (7.5).
B470	08/20/24	C. Gelat	5.20	Conference with case team re project attorney review (.2); provide feedback to project attorneys based on case team guidance (.6); perform targeted



LaVie Care Centers, LLC

Client: 120098  
 Invoice: 3950364  
 Invoice Date: 10/31/24

Task	Date	Name	Hours	Description
				search for financial documents and confirm responsiveness designation (.4); update review set tracker in connection with excluding non-inclusive privilege hits in review set and hard tag documents in database re same (.3); update Q&A spreadsheet with feedback provided by case team and upload same to database for project attorney review (.4); perform search in project attorney reviewed documents and quality check responsiveness designation of agreements, and follow up with case team re same (.4); perform targeted search for sample document and upload same to database for project attorney review (.3); construct searches for potential documents to queue up for quality control (.7); follow up with technology project manager and batch out additional documents for quality control (.4); convey additional information to case team as they work through additional quality control batches (.3); run metrics re review set, update spreadsheet, and draft email to case team re same (.5); construct production search, quality check same, and draft email to case team and technology project manager with breakdown of documents slated for production (.7).
B470	08/20/24	T. Cramton	11.00	Review and code 8/19/2024 potential priv set from 1L review (1.0); prepare and send email with additional instructions on responsiveness to review team (.5); conference with MWE case team on review status and game plan for upcoming production, including follow up emails to review/e-discovery team on same (.5); conference with C. Gelat on review progress/expectations (.2); correspondence with E. Keil on protective order status (.1); 2L QC review and coding (4.7); conferences with E. Keil, D. Simon, and N. Bull on Recovery Corp.'s discovery requests, including related prep/analysis of Recovery Corp.'s objection papers (2.5); additional 2L QC coding and review, including emails and internal conference with MWE e-discovery and review teams on process for



LaVie Care Centers, LLC

Client: 120098  
Invoice: 3950364  
Invoice Date: 10/31/24

Task	Date	Name	Hours	Description
B470	08/20/24	E. Kwon	0.70	planned production (1.5). Assist with quality assurance review of documents in queue for production and prepare documents for upcoming production (.7).
B470	08/20/24	R. Crooks	7.00	Review and analyze emails for responsiveness and privilege in response to UCC request (7.0).
B470	08/20/24	M. Khurana	3.50	Confer with H. Putre, T. Cramton, and N. Bull re document review and analysis strategy (.5); review and analyze emails for responsiveness and privilege in response to UCC request (3.0).
B470	08/20/24	J. Goebel	7.50	Review and analyze emails for responsiveness and privilege in response to UCC request (7.5).
B470	08/20/24	A. Schiller	0.40	Assist with review of potentially privileged documents (.4).
B470	08/20/24	D. Hope	8.10	Review and analyze emails for responsiveness and privilege in response to UCC request (8.1).
B470	08/20/24	N. Bull	7.60	Multiple conferences and correspondence with client, Synergy counsel and MWE team re litigation strategy and discovery (6.5); draft correspondence to Synergy (.4); draft correspondence to Recovery Corp. (.4); review edits to protective order (.3).
B470	08/21/24	H. Putre	0.20	Review correspondence re document review workstreams and queries (.2).
B470	08/21/24	G. Rutherford	8.50	Review and analyze emails for responsiveness and privilege in response to UCC request (8.5).
B470	08/21/24	J. Goebel	7.70	Review and analyze emails for responsiveness and privilege in response to UCC request (7.7).
B470	08/21/24	M. Khurana	7.50	Conduct case law research pertaining to [REDACTED] (5.3); review and analyze emails for responsiveness and privilege in response to UCC request (2.2).
B470	08/21/24	T. Terrell	8.00	Review and analyze emails for responsiveness and privilege in response to UCC request (8.0).
B470	08/21/24	C. Gelat	3.30	Review and analyze documents, and provide feedback to project attorneys (1.0); gather sample documents and request feedback from case team re same (.4); perform targeted searches for potentially privilege documents, provide results to case team and implement feedback re same (.8); update Q&A spreadsheet for project attorney review (.3);



LaVie Care Centers, LLC

Client: 120098  
Invoice: 3950364  
Invoice Date: 10/31/24

Task	Date	Name	Hours	Description
				conference with case team re project attorney review (.3); run metrics and provide results to case team (.5).
B470	08/21/24	D. Hope	7.70	Review and analyze emails for responsiveness and privilege in response to UCC request (7.7).
B470	08/21/24	R. Crooks	8.00	Review and analyze emails for responsiveness and privilege in response to UCC request (8.0).
B470	08/21/24	V. Norwood	0.40	Provide substantive direction to project attorneys re potentially privileged documents and correspond with C. Gelat re same (.4).
B470	08/21/24	E. Kwon	2.50	Assist with project attorney review and prepare documents for upcoming production (.8); conference with T. Cramton and E. Keil re specific documents production (.3); set up work flow for same (.3); coordinate preparing new UCC data room documents for case development review in the discovery document repository (1.1).
B470	08/21/24	N. Bull	5.40	Conferences and correspondence with MWE team re discovery and strategy (2.5); revise protective order and related discussions (.5); review documents and search parameters (1.5); draft correspondence to Committee (.5); review legal research (.4).
B470	08/21/24	T. Cramton	5.50	Conferences and emails with MWE e-discovery and case teams re document review, including responding to questions on responsiveness and privilege (1.5); conferences and emails with E. Keil, E. Kwon, and C. Gelat re procedure for pulling data room docs and Go-Gets in response to Recovery Corp.'s discovery requests (1.5); draft transmittal letter for Debtors' first production in response to UCC discovery requests, including per filed protective order, and send to N. Bull with comments (.5); review docket updates and correspondence with opposing counsel on protective order (.3); conferences and correspondence with N. Bull and review team re PHI confidentiality issues, including follow up with MWE team on HIPAA protective order (.7); review production specs and update transmittal letter (.3); follow up correspondence with discovery and case teams re production (.2); respond



LaVie Care Centers, LLC

Client: 120098  
Invoice: 3950364  
Invoice Date: 10/31/24

Task	Date	Name	Hours	Description
				to questions from case team on 2L priv review, including review and analysis of docs (.5).
B470	08/22/24	M. Khurana	4.10	Review and analyze emails for responsiveness and privilege in response to UCC request (4.1).
B470	08/22/24	G. Rutherford	6.00	Review and analyze emails for responsiveness and privilege in response to UCC request (6.0).
B470	08/22/24	N. Bull	2.80	Conferences and correspondence with MWE team re discovery and litigation strategy (1.5); conference with Committee (.4); review draft HIPAA order (.4); review documents (.5).
B470	08/22/24	D. Hope	8.00	Review and analyze emails for responsiveness and privilege in response to UCC request (8.0).
B470	08/22/24	R. Crooks	7.00	Review and analyze emails for responsiveness and privilege in response to UCC request (7.0).
B470	08/22/24	J. Goebel	8.00	Review and analyze emails for responsiveness and privilege in response to UCC request (8.0).
B470	08/22/24	A. Garcia	1.00	Process and promote docs to ECA and REV (1.0).
B470	08/22/24	V. Norwood	0.50	Provide substantive direction to project attorneys re PHI coding and potentially privileged documents, and correspond with C. Gelat re same (.5).
B470	08/22/24	E. Kwon	1.10	Prepare documents for redactions, identify potentially relevant documents, and prepare report re same (.9); review new UCC data room documents in the repository for quality assurance (.2).
B470	08/22/24	H. Putre	1.50	Review correspondence re document review (.2); review, analyze, and code documents (1.3).
B470	08/22/24	C. Gelat	3.50	Prepare quality control batches for case team (.7); follow up with case team re privilege review (.4); perform quality control of documents designated confidential for personal health information (.6); provide feedback to project attorneys (.6); construct targeted searches of potentially privilege documents, provide results to case team and implement feedback re same (.7); run metrics and provide results to case team (.5).
B470	08/22/24	T. Terrell	8.00	Review and analyze emails for responsiveness and privilege in response to UCC request (8.0).
B470	08/22/24	D. Valentino	1.00	Process email data and promote documents to ECA (.6); resolve technical issues (.1); conduct final QC and update search index (.3).





LaVie Care Centers, LLC

Client: 120098  
Invoice: 3950364  
Invoice Date: 10/31/24

Task	Date	Name	Hours	Description
B470	08/22/24	B. Casten	0.50	Monitor the analytics review progress and metrics, and conference re same with discovery counsel (.5).
B470	08/22/24	T. Cramton	6.00	Conferences, correspondence, and internal discussions re review and priv review with MWE case/review/e-discovery teams (2.5); conference with N. Bull re doc review status, upcoming meet and confer with Recovery Corp., and outstanding items to discuss with bankruptcy team (.8); conference with R. Higgins and N. Bull re HIPAA protective order (.4); draft protective order per same (.8); continue tagging and coding for priv review, including internal discussions and emails with MWE case team on responsiveness/privilege issues (1.5).
B470	08/23/24	N. Bull	2.50	Multiple conferences with MWE team and client re litigation strategy and discovery (2.5).
B470	08/23/24	T. Terrell	8.00	Review and analyze emails for responsiveness and privilege in response to UCC request (8.0).
B470	08/23/24	C. Gelat	3.30	Prepare quality control batches for case team review (.7); follow up with case team re project attorney review (.3); perform quality control after project attorney review is complete (1.1); draft email to technology project manager re project attorney review completion and review set (.2); update review set tracker (.2); construct searches based on excerpts of privilege terms and draft email to technology project manager to place same in privilege review batch set (.3); run metrics and provide results to case team (.5).
B470	08/23/24	H. Putre	0.10	Review correspondence re document review questions and answers (.1).
B470	08/23/24	D. Valentino	1.00	Process EDOCS data and promote documents for attorney review (.2); resolve technical issues and conduct final QC (.1); update search index and update search term reports (.2); promote saved search unpromoted STR hits+ for attorney review and conduct final QC (.3); update search index and update search term reports (.2).
B470	08/23/24	T. Cramton	1.40	Correspondence with E. Kwon, D. Simon, and N. Bull re hit counts on emails and batching out same for review (.6); correspondence and internal





LaVie Care Centers, LLC

Client: 120098  
Invoice: 3950364  
Invoice Date: 10/31/24

Task	Date	Name	Hours	Description
				discussions with MWE case team re priv review, including issues on privilege and responsiveness (.8).
B470	08/23/24	E. Kwon	1.00	Review new recovery corp documents for quality assurance and organize UCC data room documents in the discovery document repository (.6); review new emails for quality assurance and identify potentially relevant documents in same (.4).
B470	08/23/24	R. Crooks	5.00	Review and analyze emails for responsiveness and privilege in response to UCC request (5.0).
B470	08/23/24	G. Rutherford	6.30	Review and analyze emails for responsiveness and privilege in response to UCC request (6.3).
B470	08/23/24	D. Hope	5.80	Review and analyze emails for responsiveness and privilege in response to UCC request (5.8).
B470	08/23/24	J. Goebel	6.40	Review and analyze emails for responsiveness and privilege in response to UCC request (6.4).
B470	08/23/24	M. Khurana	3.20	Review and analyze emails for responsiveness and privilege in response to UCC request (3.2).
B470	08/25/24	H. Putre	0.50	Review, analyze, and code documents further to production (.5).
B470	08/26/24	M. Khurana	2.90	Review and analyze emails for responsiveness and privilege in response to UCC request (2.9).
B470	08/26/24	C. Gelat	0.40	Update review set tracker with additional privileged documents batched out to case team for review (.4).
B470	08/26/24	T. Cramton	5.00	Complete review and tagging for remaining priv review batches, including for responsiveness and privilege (4.2); correspondence with MWE case and e-discovery teams re privilege and responsiveness issues, including on QC for priv review set (.8).
B470	08/26/24	E. Kwon	0.20	Provide attorneys with additional documents for privilege review (.2).
B470	08/26/24	N. Bull	1.50	Multiple conferences re discovery and litigation strategy (1.5).
B470	08/27/24	M. Khurana	2.60	Review selected Excel document comments for privilege redactions (2.6).
B470	08/27/24	H. Putre	0.40	Review correspondence re document review and confer with M. Khurana re privilege redactions (.4).
B470	08/27/24	E. Kwon	2.00	Provide attorneys with reports and sets of documents from the privilege review project for quality assurance (.9); assist with document redaction



LaVie Care Centers, LLC

Client: 120098  
Invoice: 3950364  
Invoice Date: 10/31/24

Task	Date	Name	Hours	Description
B470	08/27/24	T. Cramton	5.20	project (.8); provide LV production documents to outside party (.3). Meet and confer with Recovery Corp. counsel (.5); correspondence with E. Keil re first production and cover letter/transmittal email (.2); compile and send quality control action-items to MWE e-discovery team to complete and return (.4); conference with N. Bull re responsiveness/privilege/redaction issues from priv review set, including prepping examples (.7); correspondence and internal discussions with N. Bull re responses and objections to Recovery Corp. doc requests, including review of updated R&O's response matrix from E. Keil (.7); correspondence and internal discussions with MWE review team and e-discovery team re next steps and outstanding issues on doc review and upcoming productions, including preparing to-do list (1.5); QC on 1L review set aimed for upcoming production (1.2).
B470	08/27/24	J. Drew	2.20	Split out different custodians data from within PST's, stage data for processing, and QC output to ensure accuracy (2.2).
B470	08/27/24	A. Garcia	2.50	Process and promote docs to ECA and REV (2.5).
B470	08/27/24	N. Bull	5.40	Meet and confer with Recovery Corp. (.5); conferences with client and MWE team re strategy and discovery (3.5); review documents (.5); revise correspondence (.5); draft email to Recovery Corp. re meet and confer (.4).
B470	08/28/24	M. Khurana	4.60	Review and redact documents responsive to Committee requests (4.6).
B470	08/28/24	H. Putre	1.40	Prepare for and confer with bankruptcy team re research questions on [REDACTED] (1.0); confer with C. Lee re same (.2); confer with M. Khurana re privilege redactions do documents (.2).
B470	08/28/24	T. Cramton	7.30	Complete QC of 2200 1L review docs and coordinate planned production with MWE e-discovery team (6.3); attention to other discovery-related matters, including document collection and processing/custodial issues (.5); begin drafting



LaVie Care Centers, LLC

Client: 120098  
Invoice: 3950364  
Invoice Date: 10/31/24

Task	Date	Name	Hours	Description
				R&O's to Recovery Corp. RFPs (.5).
B470	08/28/24	E. Kwon	0.90	Isolate documents for production, review for quality assurance, and prepare same for production (.9).
B470	08/28/24	N. Bull	4.80	Conferences and emails with MWE team and client re litigation strategy and discovery (2.5); review presentation (.5); draft email to the Committee (.3); revise discovery responses (1.5).
B470	08/28/24	B. Paulsen	0.40	Conference with J. Haims re section for breach of fiduciary duty in white paper (.4).
B470	08/29/24	T. Cramton	8.20	Final QC and coordination for Debtors' second production, including drafting and sending cover letters and transmittal emails (2.1); conference with N. Bull re case developments and potential issues with divestments, Omega, and equity investors (.7); attention to discovery-related matters, including emails with Synergy and MWE e-discovery re Dias/tort plaintiff emails (.7); correspondence and internal discussions with case team on priv review QC and steps to finalize (.6); continue drafting responses and objections to Recovery Corp. RFPs (3.7); review correspondence with Recovery Corp. counsel, plus related emails and internal discussions with MWE team on same (.4).
B470	08/29/24	H. Putre	5.20	Research and analysis re [REDACTED] and draft summary re same (5.2).
B470	08/29/24	A. Garcia	1.00	Process to ECA (1.0).
B470	08/29/24	E. Kwon	3.10	Isolate documents for production, review for quality assurance, and prepare same for production (2.1); provide external user access to the discovery document repository (.3); isolate documents for same (.7).
B470	08/29/24	N. Bull	4.80	Multiple conferences and emails with MWE team and client re discovery and strategy (3); correspondence with Recovery Corp. (.3); revise discovery responses (1.5).
B470	08/29/24	B. Paulsen	2.30	Further review of case law re breach of fiduciary duty under Delaware law and draft section of white paper re same (2.3).
B470	08/30/24	H. Putre	7.30	Review correspondence and document review



LaVie Care Centers, LLC

Client: 120098  
Invoice: 3950364  
Invoice Date: 10/31/24

Task	Date	Name	Hours	Description
				database, and confer with team re status of impending production items (.9); conduct legal research and analysis re [REDACTED] (4.9); review and redact documents in remaining unfinished privilege review buckets, and confer with team re same (.8); confer with D. Simon re legal research and analysis of [REDACTED] (.2); draft and revise legal analysis re memorandum (.5).
B470	08/30/24	C. Gelat	2.60	Perform quality control over privilege review set and identify inconsistent designations, including privilege redactions (1.4); perform targeted searches and categorize documents slated for production, identify outstanding items to be reconciled and provide links to saved searches with results to case team (.6); follow up with case team re documents redacted but not identified as such in privilege review layout (.3); correspondence with case team with additional feedback re documents slated for privilege review and production (.3).
B470	08/30/24	T. Cramton	6.10	Continue drafting responses and objections to Recovery Corp.'s discovery requests (5.3); correspondence with N. Bull re same (.1); attention to document review QC and other discovery-related matters, including emails with H. Putre and C. Gelat on same (.7).
B470	08/30/24	N. Bull	2.00	Conferences and correspondence with MWE team and client re discovery and strategy (2.0).
B470	08/30/24	B. Paulsen	1.20	Finalize section re fiduciary duty claims following conference with D. Simon (1.2).
B470	08/31/24	T. Cramton	2.80	Complete initial draft R&O's to Recovery Corp. RFPs and send same to N. Bull with comments (2.8).
B470	08/31/24	H. Putre	2.50	Review, analyze, and redact documents in privilege review set for production (2.5).
<b>Total Hours</b>			<b>1,257.10</b>	



LaVie Care Centers, LLC

Client: 120098  
Invoice: 3950364  
Invoice Date: 10/31/24

### Timekeeper Summary

Name	Hours	Rate	Amount
L. Barrett	10.20	1,245.00	12,699.00
J. Bishop Jones	7.00	360.00	2,520.00
N. Bull	95.70	1,650.00	157,905.00
B. Casten	1.00	690.00	690.00
C. Clear	3.30	805.00	2,656.50
T. Cramton	115.80	1,290.00	149,382.00
R. Crooks	33.80	55.00	1,859.00
J. Drew	2.20	300.00	660.00
N. Fomba	40.00	1,200.00	48,000.00
L. Foody	13.70	1,040.00	14,248.00
A. Garcia	4.50	280.00	1,260.00
C. Gelat	32.50	590.00	19,175.00
J. Goebel	36.40	55.00	2,002.00
D. Golinghorst	1.20	1,155.00	1,386.00
J. Haake	59.00	1,335.00	78,765.00
J. Haims	60.50	1,830.00	110,715.00
R. Higgins	0.40	1,600.00	640.00
D. Hope	36.20	55.00	1,991.00
J. Jumbeck	41.80	1,245.00	52,041.00
G. Karch	0.70	2,210.00	1,547.00
E. Keil	191.30	1,245.00	238,168.50
M. Khurana	30.30	805.00	24,391.50
E. Kwon	21.00	570.00	11,970.00
C. Lee	22.30	1,155.00	25,756.50
D. Northrop	18.70	745.00	13,931.50
V. Norwood	2.90	515.00	1,493.50
B. Paulsen	12.00	1,200.00	14,400.00
H. Putre	24.60	925.00	22,755.00
N. Rainey	5.30	500.00	2,650.00
G. Rutherford	36.80	55.00	2,024.00
A. Schiller	0.40	570.00	228.00
D. Simon	165.80	1,650.00	273,570.00
R. Smethurst	0.30	1,650.00	495.00
A. Spisak	6.00	1,245.00	7,470.00
T. Terrell	38.50	55.00	2,117.50
R. Trickey	32.10	925.00	29,692.50
H. Udow	7.50	1,200.00	9,000.00





LaVie Care Centers, LLC

Client: 120098  
Invoice: 3950364  
Invoice Date: 10/31/24

Name	Hours	Rate	Amount
D. Valentino	5.60	280.00	1,568.00
M. Wilder	0.50	1,975.00	987.50
C. Zhu	39.30	1,040.00	40,872.00
<b>Totals</b>	<b>1,257.10</b>		<b><u>\$1,383,682.50</u></b>

### Task Code Summary

Task Code	Description	Hours	Amount
B110	Case Administration	3.10	3,607.50
B130	Asset Disposition	14.40	20,946.50
B140	Relief from Stay/Adequate Protection Proceedings	58.10	65,050.50
B150	Mtgs/Communications w/Creditor	20.00	27,268.50
B155	Court Hearings	3.00	3,859.00
B160	Fee/Employment Applications	14.50	16,863.50
B185	Assumption/Rejection of Leases	12.60	15,387.00
B190	Other Contested Matters	221.40	317,213.50
B210	Business Operations	40.10	38,035.50
B220	Employee Benefits/Pensions	0.60	801.00
B230	Financing/Cash Collections	3.50	4,207.50
B240	Tax Issues	1.70	3,359.50
B270	Utilities	7.90	9,531.50
B280	Vendor Matters	5.20	6,610.00
B290	Insurance	7.40	9,486.00
B310	Claims Administration & Object	0.50	825.00
B320	Plan and Disclosure Statement	152.80	207,652.50
B430	Internal Investigation	173.50	238,926.00
B460	General Corporate	0.40	640.00
B470	Litigation	516.40	393,412.00
		<b>1,257.10</b>	<b>1,383,682.50</b>

**EXHIBIT B**

**Expense Detail**





LaVie Care Centers, LLC

Client: 120098  
Invoice: 3950364  
Invoice Date: 10/31/24

## Costs and Other Charges

Description	Amount
Business Meal	27.53
Lunch meal at court cafeteria re 341 meeting on 8/12/2024 (D. Simon)	
Computer Research	12,996.89
Computer Research	
Computer Usage Charge - Data Review & Production Software	6,000.00
"August monthly fee for Discovery Platform Use (RelativityOne, 531.47 GBs)"	
Computer Usage Charge - Data Review & Production Software	3,447.20
"August monthly fee for Data Processing (RelativityOne, 86.18 GBs)"	
Document Retrieval	10.00
VENDOR: Courthouse News Service; INVOICE#: INV2004834; DATE: 8/1/2024 - Richmond Circuit Court, Case CL19005132-00 (Courthouse News Service, downloads for July 2024)	
Miscellaneous	462.30
Obtain transcript of 7/31/2024 hearing on the Official Committee of Unsecured Creditors' motion for Rule 2004 examinations in In re LaVie Care Centers, LLC, et al., Case No. 24-55507 (PMB) (U.S. Bankruptcy Court for the Northern District of Georgia)	
Miscellaneous	54.00
Obtain transcript of 8/2/2024 hearing	
Miscellaneous	34.00
Filing fee for amended Schedule E/F for Debtor Alpha Health Care Properties, LLC, Case No. 24-55511 (PMB) (U.S. Bankruptcy Court for the Northern District of Georgia)	
Miscellaneous	199.00
Filing fee for Debtors' motion for limited relief from the automatic stay to permit Debtor Donegan Square Health Care Associates, LLC to perform under AHCA agreement (In re LaVie Care Centers, LLC, Case No. 24-55507 (PMB), U.S. Bankruptcy Court	
Search Fees	338.86
VENDOR: Chapter 11 Dockets; INVOICE#: 137491; DATE: 8/9/2024 - Search fees covering July 2024	
Transportation/Parking	10.00
Parking fee to attend 341 meeting on 8/12/2024 (D. Simon)	
<b>Total Costs and Other Charges</b>	<b>\$23,579.78</b>

**EXHIBIT A-4**

**Fourth Monthly Fee Statement**  
***September 1, 2024 – September 30, 2024***

**IN THE UNITED STATES BANKRUPTCY COURT  
NORTHERN DISTRICT OF GEORGIA  
ATLANTA DIVISION**

In re:	)	
LAVIE CARE CENTERS, LLC, <i>et al.</i> ,	)	Chapter 11
Debtors. <sup>1</sup>	)	Case No. 24-55507 (PMB)
	)	(Jointly Administered)
	)	Obj. Deadline: December 13, 2024

**SUMMARY OF FOURTH MONTHLY FEE STATEMENT OF  
MCDERMOTT WILL & EMERY LLP, COUNSEL TO THE DEBTORS AND  
DEBTORS-IN-POSSESSION, FOR ALLOWANCE OF COMPENSATION AND  
REIMBURSEMENT OF EXPENSES FOR THE PERIOD  
FROM SEPTEMBER 1, 2024 THROUGH SEPTEMBER 30, 2024**

Name of Applicant:	<b>McDERMOTT WILL &amp; EMERY LLP</b>
Authorized to provide professional services to:	<b>Debtors and Debtors-in-Possession</b>
Date of retention:	<b>July 19, 2024, effective as of June 2, 2024</b>
Period for which compensation and reimbursement is sought:	<b>September 1, 2024 through September 30, 2024</b>
Amount of compensation sought as actual, reasonable and necessary:	<b>\$1,324,876.00</b>
Amount of expense reimbursement sought as actual, reasonable and necessary:	<b>\$21,775.63</b>
This is a:	<b>Fourth Monthly Fee Statement</b>

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<sup>1</sup> The last four digits of LaVie Care Centers, LLC's federal tax identification number are 5592. There are 282 Debtors in these chapter 11 cases, which are being jointly administered for procedural purposes only. A complete list of the Debtors and the last four digits of their federal tax identification numbers are not provided herein. A complete list of such information may be obtained on the website of the Debtors' claims and noticing agent at <https://www.veritaglobal.net/LaVie>. The location of LaVie Care Centers, LLC's corporate headquarters and the Debtors' service address is 1040 Crown Pointe Parkway, Suite 600, Atlanta, GA 30338.

**Prior Fee Statements:**

<b>Document</b>	<b>Date Served</b>	<b>Period Covered</b>	<b>Requested Fees/Expenses</b>	<b>Objections Served</b>
<b>First Monthly Fee Statement</b>	August 26, 2024	6/2/24 – 6/30/24	\$1,692,647.00 / \$38,882.94	None
<b>Second Monthly Fee Statement</b>	October 3, 2024	7/1/24 – 7/31/24	\$1,036,973.50 / \$13,899.83	None
<b>Third Monthly Fee Statement</b>	November 11, 2024	8/1/24 – 8/31/24	\$1,383,682.50 / \$23,579.78	None

**LAVIE CARE CENTERS, LLC, ET AL.  
SUMMARY OF BILLING BY PROFESSIONAL  
SEPTEMBER 1, 2024 THROUGH SEPTEMBER 30, 2024**

<b>Name of Professional Person</b>	<b>Date of Bar Admission</b>	<b>Position with the Applicant and Practice Area</b>	<b>Hourly Billing Rate</b>	<b>Total Billed Hours</b>	<b>Total Compensation</b>
Joel C. Haims	1994	Partner; Trial	\$1,830	17.3	\$31,659.00
Daniel M. Simon	2008	Partner; Corporate Advisory	\$1,650	198.5	\$327,525.00
Nathan M. Bull	2006	Partner; Trial	\$1,650	123.6	\$203,940.00
Asra Chatham	2011	Partner; Trial	\$1,525	6.2	\$9,455.00
Jack G. Haake	2011	Associate; Corporate Advisory	\$1,335	61.2	\$81,702.00
Tim C. Cramton	2018	Associate; Trial	\$1,290	185.4	\$239,166.00
Alex Spisak	2014	Associate; Trial	\$1,245	7.8	\$9,711.00
Emily C. Keil	2018	Associate; Corporate Advisory	\$1,245	211.6	\$263,442.00
Jake Jumbeck	2017	Associate; Corporate Advisory	\$1,245	3.2	\$3,984.00
Natalie Rowles	2018	Associate; Corporate Advisory	\$1,245	7.1	\$8,839.50
Catherine T. Lee	2021	Associate; Corporate Advisory	\$1,155	55.9	\$64,564.50
Chenjia Zhu	2022	Associate; Trial	\$1,040	1.1	\$1,144.00
Landon Foody	2023	Associate; Corporate Advisory	\$1,040	6.1	\$6,344.00
Hayden Putre	2021	Associate; Trial	\$925	10.0	\$9,250.00

<b>Name of Professional Person</b>	<b>Date of Bar Admission</b>	<b>Position with the Applicant and Practice Area</b>	<b>Hourly Billing Rate</b>	<b>Total Billed Hours</b>	<b>Total Compensation</b>
Rebecca E. Trickey	2022	Associate; Corporate Advisory	\$925	34.5	\$31,912.50
Milind Khurana	2023	Associate; Trial	\$805	9.6	\$7,728.00
David Ratnoff	2024	Associate; Trial	\$805	6.7	\$5,393.50
Daniel Northrop	N/A	Paralegal; Corporate Advisory	\$745	15.2	\$11,324.00
Edward Kwon	N/A	Manager of Technology Project Management	\$570	11.2	\$6,384.00
Jacque Bishop Jones	N/A	Paralegal; Corporate Advisory	\$360	0.8	\$288.00
Daniel Valentino	N/A	Litigation Technology Data Analyst	\$280	1.0	\$280.00
Andy Garcia	N/A	Litigation Technology Data Analyst	\$280	3.0	\$840.00
<b>TOTALS</b>				<b>977.0</b>	<b>\$1,324,876.00</b>

**LAVIE CARE CENTERS, LLC, ET AL.  
COMPENSATION BY PROJECT CATEGORY  
SEPTEMBER 1, 2024 THROUGH SEPTEMBER 30, 2024**

<b>Project Category</b>	<b>Total Hours</b>	<b>Total Fees</b>
Case Administration	3.2	\$3,092.00
Asset Disposition	9.3	\$13,551.50
Relief from Stay / Adequate Protection Proceedings	50.4	\$58,333.00
Meetings/Communications with Creditors	1.6	\$1,992.00
Court Hearings	22.3	\$31,648.00
Fee/Employment Applications	2.4	\$2,988.00
Assumption/Rejection of Leases	9.8	\$10,961.50
Other Contested Matters	224.7	\$312,194.00
Non-Working Travel <sup>2</sup>	10.5	\$15,016.50
Business Operations	4.3	\$5,704.00
Employee Benefits/Pensions	3.0	\$3,969.00
Financing/Cash Collections	41.4	\$48,256.50
Tax Issues	1.0	\$1,317.00
Utilities	1.2	\$1,602.00
Vendor Matters	0.9	\$1,174.50
Insurance	2.3	\$2,290.50
Claims Administration & Objections	6.9	\$5,642.50
Plan and Disclosure Statement	216.40	\$302,475.00
Internal Investigation	23.0	\$37,067.50
Litigation	342.4	\$465,601.00
<b>TOTALS</b>	<b>977.0</b>	<b>\$1,324,876.00</b>

<sup>2</sup> The hours billed to Non-Working Travel were reduced by fifty percent (50%), as reflected in the time detail attached hereto as **Exhibit A**.



**LAVIE CARE CENTERS, LLC, ET AL.**  
**EXPENSE SUMMARY**  
**SEPTEMBER 1, 2024 THROUGH SEPTEMBER 30, 2024**

<b>Expense Category</b>	<b>Service Provider (if applicable)</b>	<b>Total Expenses</b>
Computer-Assisted Research	Various	\$7,565.57
Transcripts	N/A	\$102.00
Filing Fees	Various	\$100.00
Travel Expenses	Various	\$4,896.60
Courier and Messenger Fees	Various	\$51.74
Business Meals	Various	\$1,197.48
Catering for Mediation	ezCater, Inc.	\$1,862.24
Discovery Hosting Charges	RelativityOne	\$6,000.00
<b>TOTAL</b>		<b>\$21,775.63</b>

**EXHIBIT A**

**Time Detail**



Invoice: 3961515  
Client: 120098

11/29/24

LaVie Care Centers, LLC  
1040 Crown Pointe Parkway  
Atlanta, GA 30338

For Services Rendered in Connection with:

Matter: 0013 Chapter 11

Task	Date	Name	Hours	Description
B110	09/04/24	J. Haake	0.50	Correspondence with E. Keil re case administration issues (.5).
B110	09/06/24	J. Haake	0.70	Correspondence with D. Northrop and E. Aguayo re service issues (.4); correspondence with A. Lojek re administrative issues (.3).
B110	09/09/24	D. Northrop	0.70	Update case critical dates memo (.7).
B110	09/10/24	D. Northrop	1.30	Draft application for admission pro hac vice for T. Cramton (1.2); correspondence with T. Cramton re same (.1).
B130	09/03/24	D. Simon	0.80	Multiple communications with Stout and others re sale process matters (.8).
B130	09/04/24	J. Jumbeck	0.40	Conference with D. Marker (PR team) re sale process update (.2); correspondence with D. Marker re same (.2).
B130	09/04/24	D. Simon	1.20	Multiple conferences with Stout and Chapman re sale process issues (1.2).
B130	09/05/24	J. Haake	0.80	Prepare for and participate in call with D. Simon re auction process and strategy (.8).
B130	09/05/24	E. Keil	0.50	Conference with M. Krakovsky, B. Jones, et al. re sale status (.5).
B130	09/05/24	D. Simon	1.60	Multiple conferences re Stout and sale process (1.6).
B130	09/06/24	J. Haake	2.30	Draft notice of cancellation of sale (1.0); correspondence with D. Simon re auction notice (.5); revise same and correspondence with D. Northrop re same (.8).
B130	09/06/24	D. Northrop	0.40	Review draft of Debtors' notice of cancellation of auction and sale hearing (.1); finalize same (.1); file same (.2).
B130	09/06/24	D. Simon	1.20	Conferences with DIP lenders and Committee re sale matters (1.2).
B130	09/10/24	D. Northrop	0.10	Review Recovery Corp.'s objection to transaction(s)



LaVie Care Centers, LLC

Client: 120098  
Invoice: 3961515  
Invoice Date: 11/29/24

Task	Date	Name	Hours	Description
				authorized within the Debtors' proposed final sale order, and correspondence with MWE team re same (.1).
B140	09/03/24	D. Northrop	1.20	Review draft of amended joint notice of adjournment of hearing on motions for relief from the automatic stay (by Occilien Movants and Ormond Movant) (.2); revise same (.3); correspondence with J. Haake re revisions to the amended notice (.1); finalize amended notice (.1); file amended notice of adjournment (.2); coordinate supplemental service of the amended notice by Verita Global (.1); review notice of hearing on motion to modify stay by S. Sifrit, as personal representative of the estate of J. Smith (.1); correspondence with MWE team re same (.1).
B140	09/04/24	J. Haake	1.10	Prepare for and participate in conference with M. Rotbert re potential motion to lift stay (.9); correspondence with D. Simon re same (.2).
B140	09/05/24	R. Trickey	0.90	Draft objection to Sifrit motion to lift stay (.9).
B140	09/05/24	J. Haake	0.70	Prepare for and participate in conference with N. Brannick re lift stay issue (.7).
B140	09/05/24	D. Simon	1.00	Conference with J. Haake, counsel re Lezzoni lift stay (1.0).
B140	09/06/24	J. Haake	0.50	Correspondence with lift stay movants re insurance issues (.5).
B140	09/11/24	R. Trickey	1.50	Conference with J. Haake re lift stay objection matters and strategy (.5); review and analyze Almonte motion to lift stay (.2); review and analyze Iezzoni motion to lift stay (.5); correspond with MWE team and client team re insurance matters related to lift stay motions (.3).
B140	09/11/24	J. Haake	1.20	Review motion to lift stay and correspondence with R. Trickey re same (.4); review Committee's objection to AHCA lift stay motion and correspondence with D. Simon re same (.8).
B140	09/11/24	D. Northrop	0.30	Review Committee's objection to Debtors' motion for order granting limited relief from the automatic stay, to the extent applicable, to permit Debtor Donegan Square Health Care Associates, LLC to perform under AHCA Agreement, and



LaVie Care Centers, LLC

Client: 120098  
Invoice: 3961515  
Invoice Date: 11/29/24

Task	Date	Name	Hours	Description
				correspondence with MWE team re same (.1); review motions for relief from the automatic stay filed by Ana Almonte and Mary Ann Lezzoni, as agent-in-fact for Angeline Lamana (.1); correspondence with MWE team re same (.1).
B140	09/12/24	J. Haake	0.40	Correspondence with R. Trickey re insurance issues and relief from stay issues (.4).
B140	09/12/24	R. Trickey	0.70	Correspond with J. Haake and A. Spisak re lift stay insurance matters (.4); conference with J. Haake re lift stay concerns (.2); review analysis of insurance matters (.1).
B140	09/13/24	A. Spisak	3.00	Review insurance policies in connection with motion to lift stay (3.0).
B140	09/13/24	R. Trickey	0.90	Correspond with A. Spisak, J. Haake, and client re insurance matters (.4); draft omnibus lift stay objection (.5).
B140	09/14/24	R. Trickey	0.50	Review Garrett motion to lift stay (.5).
B140	09/17/24	R. Trickey	6.90	Draft omnibus objection to relief from stay motions (4.5); research issues re [REDACTED] [REDACTED] (2.4).
B140	09/18/24	R. Trickey	5.20	Draft omnibus lift stay objection (5.2).
B140	09/19/24	R. Trickey	0.40	Revise omnibus lift stay objection (.1); correspond with J. Haake re same (.3).
B140	09/19/24	J. Haake	1.10	Revise omnibus objection to lift stay motions (1.1).
B140	09/20/24	J. Haake	1.50	Revise omnibus lift stay objection (1.5).
B140	09/20/24	D. Northrop	0.20	Review Office Business Solutions, LLC's motion for relief from the automatic stay and separately-filed notice of hearing for Office Business Solutions' stay relief motion (.1); correspondence with MWE team re same (.1).
B140	09/21/24	A. Spisak	1.50	Review insurance policies in connection with motion to lift stay (1.5).
B140	09/22/24	A. Spisak	0.50	Review insurance policies in connection with motion to lift stay (.5).
B140	09/22/24	R. Trickey	0.40	Revise omnibus lift stay objection re insurance information (.4).
B140	09/22/24	J. Haake	0.40	Correspondence with A. Spisak re insurance issues (.1); revise omnibus objection (.3).
B140	09/23/24	J. Haake	2.40	Conference with S. Brazill re negotiations with equipment lender and analysis of lender documents



LaVie Care Centers, LLC

Client: 120098  
Invoice: 3961515  
Invoice Date: 11/29/24

Task	Date	Name	Hours	Description
				(.4); conference with B. Lynch re lift stay motion (.6); correspondence with D. Simon and J. Watson re same (.4); correspondence with R. Ahmed re same (.3); revise omnibus objection to lift stay motions (.7).
B140	09/24/24	A. Spisak	0.30	Review insurance policies in connection with motion to lift stay (.3).
B140	09/24/24	J. Haake	2.90	Correspondence and conference with B. Lynch re lift stay motion and settlement discussions (.9); conference with S. Brazill re equipment leases (.3); analyze bankruptcy pleadings re assumption issues related to lift stay motion (1.2); correspondence with J. Watson re lift stay issues (.5).
B140	09/25/24	J. Haake	1.10	Investigate lease issues and review motion to lift stay (.8); correspondence with J. Watson re same (.3).
B140	09/26/24	J. Haake	1.70	Correspondence and conferences with B. Lynch re settlement and lift stay (.6); draft agreed order and correspondence with B. Lynch (.3); conference with B. Lynch re withdrawal of motions and settlement discussions (.8).
B140	09/27/24	J. Haake	0.80	Correspondence and conference with B. Lynch re settlement and lift stay (.8).
B140	09/27/24	C. Lee	0.60	Research case law re [REDACTED] (.5); correspond with A. Chatham re same (.1).
B140	09/28/24	J. Haake	4.10	Revise draft omnibus objection to lift stay motions to incorporate information re second amended plan and related case law (4.1).
B140	09/29/24	J. Haake	0.60	Correspondence with B. Lynch re settlement and lift stay (.6).
B140	09/30/24	C. Lee	0.40	Review and revise letter re stay violation (.1); research [REDACTED] re same (.3).
B140	09/30/24	D. Northrop	0.80	Review exhibits to Debtors' omnibus objection to stay relief motions and confirm redaction of certain information in the exhibits (.2); finalize Debtors' omnibus objection to stay relief motions (.1); file same (.2); coordinate arrangements for additional service of the Debtors' omnibus objection by the Debtors' claims and noticing agent, including assembling names and address information for stay



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LaVie Care Centers, LLC

Client: 120098  
Invoice: 3961515  
Invoice Date: 11/29/24

Task	Date	Name	Hours	Description
				relief movants (.3).
B140	09/30/24	J. Haake	2.70	Revise omnibus objection to lift stay to incorporate comments from E. Keil, and finalize for filing same (2.7).
B150	09/02/24	E. Keil	0.20	Correspondence with creditors re inquiries (.2).
B150	09/10/24	E. Keil	0.40	Correspondence with Ohio AG re litigation (.4).
B150	09/11/24	E. Keil	0.70	Correspondence with creditors re claims process, automatic stay, etc. (.7).
B150	09/12/24	E. Keil	0.30	Correspondence with M. Clontz re claim (.3).
B155	09/03/24	J. Haake	0.50	Revise notice of hearing and correspondence with D. Northrop re filing same (.5).
B155	09/03/24	D. Northrop	0.20	File Debtors' notice of cancelled 9/4/2024 omnibus hearing (.2).
B155	09/03/24	E. Keil	0.30	Revise notice re continued hearings (.2); correspondence with D. Northrop re filing of same (.1).
B155	09/13/24	E. Keil	0.40	Draft notice of continued hearings (.3); correspondence with D. Northrop re filing of same (.1).
B155	09/17/24	D. Northrop	0.70	Prepare transcript request for 9/17/2024 status hearing (.6); submit transcript request to the transcriber (.1).
B155	09/17/24	D. Simon	1.30	Prepare for and participate in virtual hearing (1.3).
B155	09/17/24	E. Keil	0.30	Prepare for and attend status hearing (.3).
B155	09/17/24	N. Bull	0.50	Prepare for and attend status hearing (.5).
B155	09/20/24	E. Keil	0.40	Draft notice of continued DS hearing (.3); correspondence with D. Simon re same (.1).
B155	09/20/24	D. Northrop	0.30	Obtain transcript of 9/17/24 status conference re Debtors' disclosure statement (.1); review same (.1); correspondence with MWE team re (.1).
B155	09/23/24	E. Keil	0.60	Draft hearing notices re plan/DS, 365(d)(4) motion, and adversary (.6).
B155	09/27/24	E. Keil	0.70	Draft hearing agendas re adversary, main proceeding (.6); correspondence with D. Northrop, D. Simon re same (.1).
B155	09/30/24	D. Northrop	0.40	Prepare transcript request for 9/30/2024 hearings in the main case and in Adv. Pro. 24-5127 (.3); correspondence with transcriber re transcript order (.1).
B155	09/30/24	E. Keil	4.80	Prepare for and participate in disclosure statement





LaVie Care Centers, LLC

Client: 120098  
Invoice: 3961515  
Invoice Date: 11/29/24

Task	Date	Name	Hours	Description
				hearing (4.8).
B155	09/30/24	D. Simon	7.00	Prepare for DS hearing (3.5); travel to and attend hearing (3.5).
B155	09/30/24	T. Cramton	1.40	Attend virtual hearing, including internal discussions and emails with MWE team on Recovery Corp. standing argument/issue (1.4).
B155	09/30/24	N. Bull	2.50	Attend hearing re disclosure statement and other issues (2.5).
B160	09/10/24	E. Keil	0.90	Review time detail for privilege issues and compliance with Local Rules (.9).
B160	09/29/24	E. Keil	1.50	Review and revise time entries for privilege issues and compliance with Local Rules (1.5).
B185	09/04/24	D. Northrop	0.10	Review objection of Cigna to notice of revised list of potentially assumed executory contracts and unexpired leases and related cure costs, and correspondence with MWE team re same (.1).
B185	09/04/24	E. Keil	0.70	Revise cure objection tracker (.7).
B185	09/05/24	D. Northrop	1.00	Review objections to potential assumption and assignment of executory contracts and unexpired leases and cure amounts filed by Healthcare Services Group, Inc., Gale Healthcare Solutions, LLC, Davies Claims Solutions, L.L.C., UnitedHealthcare Insurance Company, Corporate Fleet Services, Inc., Johnson Controls Fire Protection LP, Powerback Rehabilitation, LLC and Respiratory Health Services, LLC, Humana, and LEAF Capital Funding LLC (.9); correspondence with MWE team re same (.1).
B185	09/05/24	L. Foody	1.40	Draft cure objections chart (1.4).
B185	09/06/24	E. Keil	0.60	Revise cure notice (.6).
B185	09/15/24	E. Keil	3.10	Revise 365(d)(4) motion (3.1).
B185	09/16/24	D. Northrop	0.30	Review Debtors' motion for order extending time to assume or reject unexpired leases of nonresidential real property and accompanying notice of hearing (.1); file same on the ECF case docket (.2).
B185	09/16/24	E. Keil	1.80	Revise 365(d)(4) motion (1.2); conference with D. Simon re same (.3); draft notice re same (.2); correspondence with D. Northrop re filing (.1).
B185	09/19/24	L. Foody	0.20	Revise claims objection chart (.2).
B185	09/23/24	D. Northrop	0.30	Review notice of rescheduled hearing with respect



LaVie Care Centers, LLC

Client: 120098  
Invoice: 3961515  
Invoice Date: 11/29/24

Task	Date	Name	Hours	Description
				to Debtors' motion for order extending time to assume or reject unexpired leases of nonresidential real property (.1); file same on the ECF case docket (.2).
B185	09/23/24	L. Foody	0.30	Revise cure objection chart (.3).
B190	09/01/24	D. Simon	4.50	Revise mediation statement (.6); draft presentation re divestitures and consideration (3.4); conferences with DIP Lenders re discovery matters (.5).
B190	09/01/24	E. Keil	9.70	Revise objection to motion to dismiss (6.3); analyze mediation and settlement issues, and revise mediation statement (3.4).
B190	09/02/24	E. Keil	7.20	Analyze mediation issues (4.4); revise presentations re same (1.5); research re analysis re same (1.3).
B190	09/02/24	D. Simon	2.60	Review analysis and research re [REDACTED] (1.3); conferences with R. Ahmed re financial analysis (.4); conferences with N. Bull re discovery and adversary matters (.3); review and revise objection to motion to dismiss (.6).
B190	09/03/24	C. Lee	4.70	Research legal issues re [REDACTED] (3.6); summarize findings re same (.8); correspond with E. Keil re same (.2); correspond with D. Simon, MWE team re stay extension (.1).
B190	09/03/24	D. Simon	7.80	Revise objection to motion to dismiss (2.2); meet and confer with Recovery Corp. (.5); multiple conferences with Ankura re mediation and litigation matters (1.6); conferences with Chapman re privilege matters (.7); conference with Synergy re Committee presentation on divestitures (.8); multiple conferences re Recovery Corp. litigation and discovery (1.5); finalize mediation statement (.5).
B190	09/03/24	E. Keil	9.20	Conferences with T. Cramton, N. Bull re discovery (1.0); conferences with MWE team, Ankura team re mediation issues (2.1); conference with J. Decker, B. Jones re same (.9); conference with F. Lawall, D. Kovsky, et al. re consideration presentation (1.0); research re mediation issues (2.3); revise mediation materials re same (1.9).
B190	09/04/24	D. Northrop	0.10	Review Recovery Corp.'s notice of intent to serve subpoenas for document production of Florida SNF Transferees, and correspondence with MWE team re



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LaVie Care Centers, LLC

Client: 120098  
Invoice: 3961515  
Invoice Date: 11/29/24

Task	Date	Name	Hours	Description
B190	09/04/24	C. Lee	3.30	same (.1). Research legal issues re [REDACTED] (2.1); summarize findings re same (.4); correspond with E. Keil re same (.2); research precedent re [REDACTED] (.2); draft same (.2); conference with E. Keil re same (.2).
B190	09/04/24	E. Keil	8.70	Analyze issues in connection with mediation (7.5); conference with J. Cavender, J. Decker, et al. re mediation (.9); conference with C. Lee re adversary reply (.3).
B190	09/04/24	D. Simon	7.10	Conference with mediator (.8); multiple conferences with Ankura and Chapman re mediation strategy (1.4); review relevant research and strategy re [REDACTED] (3.6); conference with litigation team re Recovery Corp. discovery (1.3).
B190	09/05/24	D. Northrop	0.30	Review Debtors' preliminary objection to Recovery Corp.'s motion to dismiss or convert Florida DivestCo Reorganizations (.1); file same (.2).
B190	09/05/24	C. Lee	2.90	Draft motion re extension of preliminary injunction (1.1); review and analyze precedent, case law re same (1.8).
B190	09/05/24	E. Keil	10.00	Analyze and research re [REDACTED] (6.1); conferences with D. Simon re same (.4); revise objection to motion to dismiss (1.2); correspondence with D. Northrop re filing of same (.1); conference with T. Cramton, D. Simon, J. Haims re Recovery Corp. discovery requests (1.2); conference with F. Lawall, D. Kovsky re consideration presentation (1.0).
B190	09/05/24	D. Simon	8.50	Prepare for and attend divestitures summary with Committee (1.0); follow up re same (.6); conference with litigation team re finalization of R&Os (1.0); numerous conferences with J. Decker, Chapman team and MWE team re investigation and next steps (2.4); analyze numerous investigation and strategy matters (3.5).
B190	09/06/24	D. Northrop	0.10	Review Recovery Corp.'s motion to compel discovery responses, and correspondence with MWE team re same (.1).
B190	09/06/24	L. Foody	0.90	Review [REDACTED] research (.9).



LaVie Care Centers, LLC

Client: 120098  
Invoice: 3961515  
Invoice Date: 11/29/24

Task	Date	Name	Hours	Description
B190	09/06/24	E. Keil	3.70	Conference with D. Simon, L. Halperin, et al. re mediation issues (1.1); analyze and research re [REDACTED] (1.5); review motion to compel (.5); review and revise discovery responses (.6).
B190	09/06/24	C. Lee	8.80	Draft motion re extension of preliminary injunction (3.8); review and analyze precedent, case law re same (2.2); review and revise same (2.6); correspond with D. Simon, MWE team re [REDACTED] research (.2).
B190	09/06/24	D. Simon	8.50	Numerous conferences with Chapman and Decker teams re investigation matters (2.5); numerous communications to prep for mediation (2.8); analyze and revise mediation prep items (3.2).
B190	09/07/24	L. Foody	3.30	Research re [REDACTED] (2.9); draft summary re same (.4).
B190	09/07/24	D. Simon	3.00	Review and provide comments to investigation report (3.0).
B190	09/07/24	E. Keil	2.70	Analyze mediation issues (2.4); correspondence with D. Simon re same (.3).
B190	09/08/24	D. Simon	1.50	Discussions in preparation for mediation and investigation matters (1.5).
B190	09/09/24	A. Spisak	2.50	Review several client insurance policies in connection with motion to lift stay (2.5).
B190	09/09/24	C. Lee	1.70	Review and revise motion re extension of preliminary injunction (1.6); correspond with E. Keil re same (.1).
B190	09/09/24	E. Keil	8.60	Prepare for and attend mediation (7.9); analysis and research re same (.7).
B190	09/09/24	D. Simon	6.60	Preparations re mediation (1.5); attend mediation (4.0); discussions re discovery matters (1.1).
B190	09/10/24	E. Keil	11.40	Conferences with J. Decker, L. Halperin, B. Jones, et al. (5.1); analyze mediation issues and research re same (4.6); conferences with D. Simon, N. Bull re same (1.7).
B190	09/10/24	D. Simon	6.50	Numerous meetings with client group re mediation, investigation, and plan matters (6.5).
B190	09/11/24	E. Keil	11.30	Participate in mediation and related discussions (11.3).
B190	09/11/24	D. Simon	8.00	Prepare for and attend mediation, and attend to numerous issues in connection with same (8.0).



LaVie Care Centers, LLC

Client: 120098  
Invoice: 3961515  
Invoice Date: 11/29/24

Task	Date	Name	Hours	Description
B190	09/12/24	J. Haake	0.60	Prepare for and participate in conference with B. Jones and D. Simon re status of case and strategy (.6).
B190	09/12/24	D. Northrop	1.10	Research for sample/precedent for certification of service of discovery requests and responses pursuant to L.R.7026-3 (.5); draft certification of service for Debtors' first set of requests for admission, first set of requests for production of documents, and first set of interrogatories to Healthcare Negligence settlement Recovery Corp. (.5); correspondence with T. Cramton re draft certification of service (.1).
B190	09/12/24	E. Keil	3.60	Analyze mediation issues (2.1); correspondence with L. Halperin, J. Decker, et al. re same (.3); review discovery requests re Recovery Corp. (1.2).
B190	09/12/24	D. Simon	1.00	Conferences with Committee and DIP lenders re settlement discussions (.7); conference with UST re same (.3).
B190	09/13/24	J. Haake	0.80	Prepare for and participate in conference with D. Simon and E. Keil re status of case and strategy (.8).
B190	09/13/24	D. Simon	1.50	Conference re motion to dismiss and related Recovery Corp. matters (.7); conferences re settlement and mediation (.8).
B190	09/13/24	E. Keil	1.20	Analyze mediation issues (.6); correspondence with L. Halperin, J. Lombardo re same (.2); conference with T. Cramton, N. Bull, et al. re motion to compel (.4).
B190	09/14/24	E. Keil	3.20	Conference with N. Bull, T. Cramton, et al. re Recovery Corp. (1.1); draft UCC letter (1.9); conference with D. Simon re same (.2).
B190	09/14/24	D. Simon	1.20	Conference with litigation team re open discovery and related matters (.7); revise independent director letter and J. Anthony letter (.5).
B190	09/15/24	E. Keil	1.80	Revise correspondence to Committee, Recovery Corp. (1.4); correspondence re same (.4).
B190	09/15/24	D. Simon	1.30	Revise letters (.4); communications re same (.5); conferences with F. Lawall and others re same (.4).
B190	09/16/24	E. Keil	0.40	Review Recovery Corp.'s motion for standing (.4).
B190	09/16/24	J. Haake	0.90	Prepare for and participate in conference with D. Simon to discuss status and strategy of case (.9).



LaVie Care Centers, LLC

Client: 120098  
Invoice: 3961515  
Invoice Date: 11/29/24

Task	Date	Name	Hours	Description
B190	09/16/24	D. Simon	1.50	Numerous conferences and communication re settlement and mediation (1.5).
B190	09/16/24	D. Northrop	0.40	Draft certification of service for Debtors' second set of requests for production of documents, and second set of interrogatories to Healthcare Negligence settlement Recovery Corp. (.2); file same (.2).
B190	09/17/24	D. Simon	1.50	Negotiations with Committee, plan sponsor and J. Anthony re mediation and settlement (1.5).
B190	09/18/24	J. Haake	0.90	Analyze AHCA's license issue and Committee objection, and correspondence with T. Walsh, G. Rininger, and D. Simon re same (.9).
B190	09/18/24	D. Simon	2.40	Conference with litigation team re Brandon issues, and numerous conferences re discovery matters and Recovery Corp. litigation (2.4).
B190	09/19/24	J. Haake	1.60	Prepare for and participate in conference with T. Walsh and G. Rininger re status of case, Committee objection, and license issues (.5); prepare for and participate in conference with D. Simon and L. Aiken re Recovery Corp. motions (.7); correspondence with D. Simon re agency comments re licenses (.4).
B190	09/19/24	D. Simon	3.90	Meet and confer with Recovery Corp. (1.0); numerous discussions re Recovery Corp. standing and related matters (1.3); conferences with Committee and mediation parties re settlement and mediators proposal (1.6).
B190	09/19/24	E. Keil	2.50	Attend meet and confer re Recovery Corp. discovery (1.2); conference with T. Cramton, N. Bull, et al. re same (1.3).
B190	09/20/24	D. Simon	3.70	Multiple conferences re mediation and settlement (2.6); conference with Recovery Corp. (.6); conferences with litigation team re Recovery Corp. matters (.5).
B190	09/20/24	E. Keil	0.40	Review mediators proposal (.2); correspondence with D. Simon re same (.2).
B190	09/21/24	D. Simon	0.80	Conference with N. Bull re outstanding discovery matters (.8).
B190	09/23/24	E. Keil	0.30	Conference with C. Lee, D. Simon, et al. re standing motion response (.3).
B190	09/23/24	D. Simon	2.10	Conferences with litigation team re outstanding





LaVie Care Centers, LLC

Client: 120098  
Invoice: 3961515  
Invoice Date: 11/29/24

Task	Date	Name	Hours	Description
				discovery and litigation matters (1.3); conferences with N. Bull re same (.8).
B190	09/26/24	E. Keil	0.70	Conference with N. Bull, T. Cramton, et al. re motion to strike (.7).
B190	09/26/24	D. Simon	2.70	Conferences with client re motion to strike and other discovery matters (1.2); review and revise motion to strike (.8); conferences re Brandon matters (.7).
B190	09/27/24	D. Northrop	0.60	Review Debtors' motion to strike, cross-motion to compel, and opposition to Recovery Corp.'s motion to compel discovery responses and exhibits thereto (.2); review Local Rules for provisions governing motions containing multiple requests for relief (.1); finalize Debtors' motion to strike and exhibits (.1); file Debtors' motion to strike, cross-motion to compel, and opposition to Recovery Corp.'s motion to compel discovery responses and all exhibits thereto (.2).
B190	09/27/24	E. Keil	0.30	Draft correspondence with A. Marchant-Lessa, J. Anthony, et al. re motion to strike (.3).
B190	09/27/24	D. Simon	1.30	Further revisions to motion to strike (.7); conference re Brandon matters (.6).
B190	09/29/24	E. Keil	1.50	Revise omnibus objection re stay relief requests (1.5).
B190	09/30/24	D. Northrop	0.30	Review notice of hearing on Debtors' motion to strike, cross-motion to compel, and opposition to Recovery Corp.'s motion to compel discovery responses (.1); file same (.2).
B190	09/30/24	E. Keil	1.00	Draft automatic stay extension order (.6); review and revise omnibus objection re stay relief motions (.4).
B195	09/08/24	E. Keil	1.80	Travel to Atlanta for mediation (travel time reduced by 50%) (1.8).
B195	09/09/24	N. Bull	2.00	Travel to Atlanta for mediation (travel time reduced by 50%) (2.0).
B195	09/11/24	E. Keil	1.70	Travel from Atlanta to Chicago following mediation (travel time reduced by 50%) (1.7).
B195	09/12/24	N. Bull	2.80	Travel from Atlanta to Miami back from mediation (travel time reduced by 50%) (2.8).
B195	09/29/24	E. Keil	1.60	Travel to Atlanta for disclosure statement hearing (travel time reduced by 50%) (1.6).
B195	09/30/24	E. Keil	0.60	Commute to and from disclosure statement hearing





LaVie Care Centers, LLC

Client: 120098  
Invoice: 3961515  
Invoice Date: 11/29/24

Task	Date	Name	Hours	Description
				(.6).
B210	09/03/24	D. Northrop	0.10	Correspondence to the clerk of the Bankruptcy Court requesting revisions to docket text for amended monthly operating reports for June 2024 for Group 1 and Group 3 Debtors, filed on 8/30/2024, to correctly reflect the case numbers of the Debtors included in each group (.1).
B210	09/03/24	D. Simon	0.60	Conference with insurers re open matters (.6).
B210	09/05/24	D. Northrop	0.10	Review ombudsman report for the period 7/5/2024 through 9/5/2024 filed by Margaret Barajas relating to the Pennsylvania facilities, and correspondence with MWE team re same (.1).
B210	09/12/24	E. Keil	0.80	Conference with B. Jones, R. Ahmed re status update (.5); correspondence with J. Watson re operational items (.3).
B210	09/16/24	E. Keil	0.40	Conference with B. Jones, R. Ahmed, et al. re status update (.4).
B210	09/16/24	D. Simon	1.20	Conferences with client re operational and strategy issues (1.2).
B210	09/19/24	D. Simon	0.30	Conferences with L. Halperin and others re business operational matters (.3).
B210	09/30/24	D. Northrop	0.80	File monthly operating reports for August 2024 for three separate Debtor groups on the ECF case docket (.8).
B220	09/04/24	J. Haake	2.30	Research [REDACTED] (.7); analyze AFSCME's objection and conference with M. Blumin re sale objection (1.4); correspondence with D. Simon re same (.2).
B220	09/04/24	E. Keil	0.40	Conference with G. Hayes, R. Ahmed re employee health insurance (.4).
B220	09/05/24	J. Haake	0.30	Analyze employee issue and correspondence with E. Keil re same (.3).
B230	09/03/24	J. Jumbeck	1.60	Draft first amendment to DIP credit agreement (.7); revise same (.4); correspondence with D. Simon re same (.2); revise same (.3).
B230	09/16/24	R. Trickey	3.80	Review and analyze financing documents re obligations and guarantees (3.8).
B230	09/16/24	D. Northrop	0.10	Review Recovery Corp.'s motion to establish standing to challenge final DIP financing order, and correspondence with MWE team re same (.1).



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LaVie Care Centers, LLC

Client: 120098  
Invoice: 3961515  
Invoice Date: 11/29/24

Task	Date	Name	Hours	Description
B230	09/17/24	J. Jumbeck	0.40	Correspondence with MWE team re amendment to DIP credit agreement (.2); correspondence with GP team re same (.2).
B230	09/18/24	J. Jumbeck	0.40	Conference with Goodwin team, DLA team, D. Simon, and J. Haake re DIP loan amendment (.4).
B230	09/18/24	D. Simon	0.80	Conferences with MidCap and Omega re Recovery Corp. motion to vacate issues (.8).
B230	09/19/24	C. Lee	0.90	Correspond with D. Simon, MWE team re motion to vacate DIP (.2); review and analyze same (.7).
B230	09/22/24	C. Lee	1.60	Review and analyze Recovery Corp. standing motion (.6); research [REDACTED] (1.0).
B230	09/23/24	C. Lee	8.70	Conference with D. Simon, MWE team re objection to Recovery Corp. standing motion (.4); draft same (5.6); review and analyze case law re [REDACTED] (2.4); research [REDACTED] (.3).
B230	09/24/24	C. Lee	7.80	Review and revise objection to standing motion (4.6); review and analyze case law, pleadings re same (3.2).
B230	09/25/24	C. Lee	10.20	Review and revise objection to Recovery Corp. DIP standing motion (6.2); review and analyze case law re same (3.8); correspond with T. Cramton, MWE team re same (.2).
B230	09/27/24	C. Lee	1.60	Review and revise objection to Recovery Corp. standing motion (1.4); correspond with D. Simon, E. Keil re same (.2).
B230	09/27/24	D. Simon	1.50	Revise objection to motion to vacate DIP (1.5).
B230	09/28/24	C. Lee	1.20	Review and revise objection to Recovery Corp. DIP standing motion (1.1); correspond with D. Simon, MWE team re same (.1).
B230	09/30/24	C. Lee	0.80	Review and revise objection to DIP standing motion (.7); correspond with N. Bull, MWE team re same (.1).
B240	09/02/24	E. Keil	0.20	Correspondence with B. Baron re tax audit (.2).
B240	09/11/24	J. Haake	0.80	Correspondence and conference with R. Ahmed re tax issues (.2).
B270	09/11/24	J. Haake	0.70	Correspondence with S. Brazill re utility issue (.2); conference with Staunton Public Works representative re same (.5).
B270	09/12/24	J. Haake	0.50	Correspondence with A. Dalsass and R. Patella re



LaVie Care Centers, LLC

Client: 120098  
Invoice: 3961515  
Invoice Date: 11/29/24

Task	Date	Name	Hours	Description
				utility issues (.5).
B280	09/03/24	J. Haake	0.20	Correspondence with R. Ahmed re vendor issues (.2).
B280	09/06/24	E. Keil	0.30	Correspondence with J. Watson, J. Haake re vendor issues (.3).
B280	09/18/24	J. Haake	0.40	Correspondence with A. Lojek re vendor issues (.4).
B290	09/03/24	J. Haake	0.40	Analyze insurance and employee issues, and correspondence with E. Keil re same (.4).
B290	09/04/24	J. Haake	0.50	Conference with L. Williams re insurance issues (.5).
B290	09/06/24	J. Haake	0.30	Correspondence with G. Hayes re insurance issues (.3).
B290	09/09/24	J. Haake	0.30	Correspondence with A. Spisak re insurance policy issues (.3).
B290	09/23/24	J. Bishop Jones	0.50	Communications with J. Haake re sensitive information on insurance documents (.2); review and revise documents removing sensitive information, and circulate to J. Haake for review (.3).
B290	09/30/24	J. Bishop Jones	0.30	Communications with J. Haake re redacting additional insurance policy documents (.2); review and redact insurance policies, and circulate to J. Haake for review (.1).
B310	09/03/24	E. Keil	0.20	Correspondence with KCC team re claims register (.2).
B310	09/11/24	D. Ratnoff	2.70	Conference with T. Cramton re next steps for legal research re [REDACTED] (.3); review and analyze federal law re [REDACTED] (2.4).
B310	09/12/24	D. Ratnoff	4.00	Review and analyze federal law re consequences of filing a fraudulent or falsified proof of claim (4.0).
B320	09/01/24	J. Haake	0.40	Revise draft combined plan and correspondence with E. Keil re same (.4).
B320	09/03/24	R. Trickey	1.40	Revise solicitation materials (1.3); conference with J. Haake re same (.1).
B320	09/03/24	J. Haake	1.00	Revise draft solicitation materials (.6); conference and correspondence with R. Trickey re same (.4).
B320	09/04/24	R. Trickey	2.30	Review and analyze objections to disclosure statement filed on docket (2.2); correspond with E. Keil re same (.1).



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LaVie Care Centers, LLC

Client: 120098  
Invoice: 3961515  
Invoice Date: 11/29/24

Task	Date	Name	Hours	Description
B320	09/04/24	D. Northrop	0.50	Review and analyze AFSCME objection to Debtors' disclosure statement and reservation of rights with respect to potentially assumed collective bargaining agreements (filed on the docket twice), and joinder of United Steelworkers to objection of AFSCME to Debtors' disclosure statement and reservation of rights (.3); correspondence with MWE team re same (.2).
B320	09/04/24	E. Keil	1.50	Draft disclosure statement objection tracker (.6); draft reply re same (.9).
B320	09/04/24	D. Simon	1.30	Conferences with DIP lenders re plan strategy and related negotiations (1.3).
B320	09/06/24	D. Northrop	0.10	Review supplemental objection to confirmation of plan and potential assignment of executory contracts filed by Carolina Rehabilitation & Surgical Associates, P.A., and correspondence with MWE team re same (.1).
B320	09/06/24	E. Keil	1.50	Review and revise DS objection tracker (1.5).
B320	09/06/24	D. Simon	1.50	Conferences with DIP lenders re plan matters (1.5).
B320	09/08/24	D. Simon	1.20	Conferences with DIP lenders re various plan related issues (1.2).
B320	09/09/24	R. Trickey	0.30	Conference with J. Haake re solicitation procedures provisions and possible revisions to same (.3).
B320	09/09/24	J. Haake	0.80	Correspondence with E. Keil and R. Trickey re solicitation procedures (.4); conference with S. Reitzel re solicitation issues (.4).
B320	09/09/24	D. Simon	3.00	Negotiations and discussions re plan matters (3.0).
B320	09/10/24	R. Trickey	0.80	Conference with J. Haake re revisions to voting procedures (.2); revise same and ballots (.6).
B320	09/10/24	J. Haake	0.30	Correspondence with E. Keil and R. Trickey re solicitation procedures (.2); conference with S. Reitzel re solicitation issues (.1).
B320	09/10/24	D. Simon	4.00	Negotiations re plan issues (2.5); analyze and discuss plan confirmation issues (1.5).
B320	09/11/24	D. Simon	1.40	Negotiate and finalize plan construct (1.4).
B320	09/12/24	J. Haake	1.50	Revise draft solicitation timeline and correspondence with E. Keil and D. Simon re same (1.1); conference with S. Reitzel re solicitation issues (.4).
B320	09/12/24	E. Keil	2.80	Conference with R. Ahmed, B. Jones, D. Simon, et



LaVie Care Centers, LLC

Client: 120098  
Invoice: 3961515  
Invoice Date: 11/29/24

Task	Date	Name	Hours	Description
				al. re plan revisions (1.9); review solicitation procedures revisions (.7); correspondence with J. Haake re confirmation timeline (.1); conference with D. Simon re same (.1).
B320	09/12/24	D. Simon	6.40	Numerous discussions with clients and DIP lenders re plan negotiations and settlement discussions (2.6); conferences with Ankura team re same (1.8); revisions to plan (2.0).
B320	09/13/24	J. Haake	1.30	Revise bid procedures and conference with R. Trickey re same (1.3).
B320	09/13/24	R. Trickey	0.70	Conference with MWE team re plan revisions and case strategy (.7).
B320	09/13/24	D. Simon	4.00	Revise plan and disclosure statement (2.0); internal conference re solicitation strategies (.7); conferences with DIP lenders re same (1.3).
B320	09/13/24	D. Northrop	0.60	Communications with E. Keil re continuance of hearing to consider approval of the Debtors' disclosure statement to 9/23/2024 and conversion of the 9/17/2024 hearing into a status hearing (.1); review draft notice of continued disclosure statement hearing (.1); correspondence with E. Keil re revisions to notice of continued disclosure statement hearing (.1); file notice of continued disclosure statement hearing (.3).
B320	09/13/24	E. Keil	3.70	Conference with J. Haake, D. Simon, et al. re solicitation materials (.8); conference with D. Simon re same (.1); revise plan/DS (2.6); correspondence with DIP lenders re same (.2).
B320	09/14/24	R. Trickey	1.60	Revise solicitation procedures order and ancillary materials (1.5); correspond with J. Haake re same (.1).
B320	09/14/24	E. Keil	1.30	Conference with R. Ahmed, B. Jones, et al. re plan/DS exhibits (1.3).
B320	09/14/24	D. Simon	1.50	Conferences with Ankura re plan and DS exhibits (.8); conferences with DIP lenders re plan revisions (.7).
B320	09/15/24	D. Simon	2.30	Conference with DIP lenders re plan revisions (.6); review and revise plan (1.7).
B320	09/16/24	R. Trickey	1.10	Revise solicitation procedures and ancillary documents (.8); correspond with MWE team re same



LaVie Care Centers, LLC

Client: 120098  
Invoice: 3961515  
Invoice Date: 11/29/24

Task	Date	Name	Hours	Description
				(.3).
B320	09/16/24	J. Jumbeck	0.40	Conference with D. Simon and PR team re Chapter 11 plan status (.4).
B320	09/16/24	E. Keil	6.60	Conferences with D. Simon re plan revisions (1.1); revise same (4.3); conference with R. Ahmed re liquidation analysis (.6); draft plan exclusivity motion (.6).
B320	09/16/24	J. Haake	2.80	Review revisions to solicitation procedures (.2); prepare for and participate in call with MidCap re plan (.8); revise solicitation timeline and related documents, and correspondence with R. Trickey re same (1.2); correspondence with R. Trickey and E. Keil re plan and solicitation issues (.4); correspondence with D. Marker re draft plan (.2).
B320	09/16/24	D. Simon	7.50	Numerous revisions to plan/DS (3.7); conference with DOJ re plan issues (.3); negotiations re plan issues (2.0); conferences with Ankura and others re same (1.5).
B320	09/17/24	J. Haake	1.10	Research [REDACTED] and correspondence with D. Simon re same (.9); correspondence with E. Keil re plan (.2).
B320	09/17/24	D. Simon	9.60	Numerous negotiations and communications re plan issues (4.5); revisions re same (1.7); conferences with Ankura re liquidation analysis and related financials (1.4); conferences with DIP lenders re plan matters (2.0).
B320	09/17/24	E. Keil	8.60	Revise plan and disclosure statement (7.2); draft notice of filing re same (.4); prepare for and conference with B. Jones, R. Ahmed, et al. re liquidation analysis (.7); correspondence with T. Cramton, N. Bull re disclosure statement (.3).
B320	09/17/24	N. Bull	0.50	Revise disclosure statement (.5).
B320	09/17/24	T. Cramton	0.40	Preliminary review of filed disclosure statement (.4).
B320	09/18/24	J. Haake	3.80	Revise solicitation documents to incorporate information re amended plan, and correspondence with E. Keil and D. Simon re same (1.5); conference with D. Simon re solicitation issues (.4); revise solicitation documents, and correspondence with E. Keil and S. Reitzel re same (1.9).
B320	09/18/24	R. Trickey	0.20	Correspond with J. Haake re solicitation materials





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LaVie Care Centers, LLC

Client: 120098  
Invoice: 3961515  
Invoice Date: 11/29/24

Task	Date	Name	Hours	Description
				(.2).
B320	09/18/24	D. Simon	3.00	Conferences with Welltower, Committee, DIP lenders and others re plan matters (1.8); conferences with Ankura re liquidation analysis and projections (1.2).
B320	09/18/24	E. Keil	1.70	Conference with D. Simon re plan updates (.6); review solicitation procedures (1.1).
B320	09/19/24	R. Trickey	1.90	Revise solicitation procedures and ancillary documents (1.6); conference with J. Haake re same (.3).
B320	09/19/24	J. Haake	4.90	Revise solicitation documents and correspondence with R. Trickey re same (1.3); correspondence with E. Keil re same (.4); revise solicitation documents and conferences with S. Reitzel re same (1.8); correspondence with J. Brilliant re information for solicitation (.4); correspondence with D. Simon re solicitation materials (.2); conferences with Verita re administrative issues in anticipation of plan solicitation (.8).
B320	09/19/24	D. Simon	1.50	Conferences with Ankura re projections and liquidation analysis (.8); review and revise solicitation order and related exhibits (.7).
B320	09/19/24	E. Keil	6.80	Revise liquidation analysis (.8); conferences with B. Jones, R. Ahmed, et al. re same (1.4); revise solicitation procedures order, ballots, notices (3.9); conferences with D. Simon, J. Haake re same (.7).
B320	09/20/24	R. Trickey	1.60	Conference with J. Haake and E. Keil re solicitation procedures order (.4); revise same and ancillaries (.8); compile finalized documents for filing (.4).
B320	09/20/24	J. Haake	3.80	Correspondence with S. Reitzel and E. Keil re solicitation documents (.8); correspondence with R. Trickey re revisions to solicitation materials (.5); revise solicitation documents in anticipation of filing same (1.3); correspondence with J. Brilliant re solicitation issues (.2); make additional revisions to solicitation materials to address comments from E. Keil and S. Reitzel (1.0).
B320	09/20/24	E. Keil	4.10	Review and revise plan exhibits, including liquidation analysis and projections (1.3); review and revise ballots, notices, solicitation procedures





LaVie Care Centers, LLC

Client: 120098  
Invoice: 3961515  
Invoice Date: 11/29/24

Task	Date	Name	Hours	Description
				order (1.8); conference with D. Simon re plan revisions (.2); review objections to disclosure statement filed by UST, DOJ (.8).
B320	09/20/24	D. Northrop	0.20	Review limited objection of the United States to Debtors' combined disclosure statement and joint first amended chapter 11 plan of reorganization and the US Trustee's objection to Debtors' amended disclosure statement and form of ballots (.1); correspondence with MWE team re same (.1).
B320	09/21/24	R. Trickey	1.40	Review and analyze disclosure statement objections (1.4).
B320	09/21/24	E. Keil	5.80	Revise plan and disclosure statement (5.8).
B320	09/21/24	D. Simon	0.80	Conferences with B. Jones and Committee re plan related matters (.8).
B320	09/22/24	D. Simon	1.20	Plan negotiations with DIP lenders and Committee (1.2).
B320	09/23/24	D. Northrop	0.40	Review draft notice of cancellation of September 23, 2024 hearing on Debtors' disclosure statement and continued disclosure statement hearing to be held on September 30, 2024 at 2:00 p.m. (ET) (.1); correspondence with E. Keil re revisions to the notice (.1); file Debtors' notice of cancelled disclosure statement hearing on September 23, 2024 and of continued disclosure statement hearing on September 30, 2024 (.2).
B320	09/23/24	E. Keil	4.10	Conference with F. Lawall, D. Kovsky, B. Jones, et al. re plan allocation (1.1); conference with D. Simon re plan revisions (.3); revise same (1.7); conference with B. Jones, R. Ahmed, et al. re liquidation analysis (.8); correspondence with Unions re CBA language in plan (.2).
B320	09/23/24	D. Simon	7.60	Numerous plan negotiations with Committee (2.3); numerous conferences with client and mediation parties re same (5.3).
B320	09/24/24	C. Lee	0.60	Review and analyze Chubb comments to combined plan and disclosure statement (.4); correspond with E. Keil re same (.1); correspond with Chubb re same (.1).
B320	09/24/24	E. Keil	7.90	Conferences with D. Simon re plan revisions (1.8); revise same (2.5); revise solicitation procedures,



LaVie Care Centers, LLC

Client: 120098  
Invoice: 3961515  
Invoice Date: 11/29/24

Task	Date	Name	Hours	Description
				ballots, notices (2.2); conference with R. Ahmed re same (.6); conference with F. Lawall, D. Kovsky re allocation (.8).
B320	09/24/24	D. Simon	7.00	Numerous communications re negotiation of plan (2.6); multiple communications re GUC allocation with client and Committee re same (2.8); conferences with DIP lenders re same (1.6).
B320	09/25/24	C. Lee	0.10	Correspond with E. Keil re DS, plan comments (.1).
B320	09/25/24	E. Keil	6.40	Conference with R. Lapowsky, F. Lawall, et al. re plan (.5); revise same (5.9).
B320	09/25/24	D. Simon	5.50	Numerous plan negotiations (2.5); mediation matters with Committee (1.5); numerous conferences with client re GUC allocation and related matters (1.5).
B320	09/26/24	D. Northrop	0.80	File Debtors' second amended combined disclosure statement and joint chapter 11 plan of reorganization on the ECF case docket (.2); review notice of filing of redline version of second amended combined disclosure statement and joint chapter 11 plan (.1); file same on the ECF case docket (.2); review notice of filing of revised proposed solicitation procedures order (.1); file same (.2).
B320	09/26/24	E. Keil	11.40	Conferences with B. Jones, R. Ahmed re liquidation analysis (2.2); review UCC comments (.3); conference with F. Lawall, D. Kovsky, et al. re plan revisions (1.0); revise plan, disclosure statement, exhibits and prepare same for filing (5.1); revise solicitation procedures order, exhibits, notice of filing re same (2.8).
B320	09/26/24	D. Simon	9.50	Numerous negotiations, conferences, and other communications re plan (5.4); conferences with client re updates to same (1.0); conferences with Ankura re liquidation analysis and review of same (2.3); review solicitation materials and related filings (.8).
B320	09/27/24	E. Keil	2.20	Revise exclusivity extension motion (.8); review claims analysis re solicitation (1.4).
B320	09/27/24	D. Simon	1.30	Communications with UST and other objecting parties re plan matters (1.3).
B320	09/28/24	E. Keil	0.70	Correspondence with D. Simon, N. Bull re settlement (.3); review UCC comments re plan (.4).



LaVie Care Centers, LLC

Client: 120098  
Invoice: 3961515  
Invoice Date: 11/29/24

Task	Date	Name	Hours	Description
B320	09/28/24	D. Simon	3.40	Conferences with client re open settlement and plan issues (1.5); conference with N. Bull re same (.4); preparations for DS hearing (1.5).
B320	09/29/24	E. Keil	4.90	Revise exclusivity extension motion (1.0); conference with R. Ahmed, D. Simon, et al. re solicitation (1.2); conference with D. Simon re plan revisions (.6); revise same (1.3); conference with F. Lawall, D. Kovsky re same (.5); further revisions re same (.3).
B320	09/29/24	D. Simon	4.00	Communications re DS revisions and related plan negotiations (1.5); preparations for DS hearing (2.5).
B320	09/30/24	D. Northrop	0.30	File Debtors' motion for entry of order extending Debtors' exclusive periods to file a chapter 11 plan and solicit acceptances thereof (.2); upload revised proposed solicitation procedures order to the court via the ECF order upload function (.1).
B320	09/30/24	E. Keil	4.00	Commute to and from disclosure statement hearing (travel time reduced by 50%).
B320	09/30/24	D. Simon	2.00	Meetings with client re disclosure statement hearing (1.3); meetings with E. Keil re finalizing orders and related matters (.7).
B430	09/01/24	J. Haims	1.00	Research re [REDACTED] and correspondence with MWE team re same (1.0).
B430	09/02/24	J. Haims	1.00	Research re [REDACTED] and correspondence with MWE team re same (1.0).
B430	09/02/24	C. Zhu	0.30	Review correspondence re document review and production (.3).
B430	09/03/24	J. Haims	1.50	Research re [REDACTED] and correspondence with MWE team re same (1.5).
B430	09/03/24	C. Zhu	0.50	Participate in meeting with MWE team to discuss document review (.5).
B430	09/03/24	N. Rowles	0.30	Review transactions data in preparation for conference re investigation of potential estate causes of action (.3).
B430	09/04/24	J. Haims	1.50	Research [REDACTED] (1.5).
B430	09/04/24	N. Rowles	2.00	Review transactional data to assess [REDACTED] (1.4); prepare for and participate in conference with D. Simon re same



LaVie Care Centers, LLC

Client: 120098  
Invoice: 3961515  
Invoice Date: 11/29/24

Task	Date	Name	Hours	Description
				(.6).
B430	09/05/24	J. Haims	3.50	Correspondence with MWE team re claim analyses (1.0); review drafts of discovery responses, and correspondence re same and strategy (1.7); review relevant documents re same (.8).
B430	09/05/24	N. Rowles	4.80	Analyze transactional data in connection with [REDACTED] (2.5); draft summary of findings related to same (2.3).
B430	09/06/24	J. Haims	2.00	Review draft claims analysis, and correspondence with MWE re same (2.0).
B430	09/06/24	C. Zhu	0.30	Review interview memos (.3).
B430	09/07/24	J. Haims	0.50	Correspondence with MWE team re draft claims analysis, mediation, document production and review, and strategy (.5).
B430	09/08/24	J. Haims	0.50	Correspondence with MWE team re draft claims analysis, mediation, document production and review, and strategy (.5).
B430	09/09/24	J. Haims	0.70	Correspondence with MWE team re claim analyses, document production and review, and strategy (.7).
B430	09/11/24	J. Haims	0.30	Correspondence with MWE team re claim analyses, document production and review, and strategy (.3).
B430	09/12/24	J. Haims	0.30	Correspondence with MWE team re claim analyses, document production and review, and strategy (.3).
B430	09/13/24	J. Haims	1.00	Correspondence with MWE team re claim analyses, document production and review, mediation, and strategy (1.0).
B430	09/14/24	J. Haims	0.50	Review draft letter to J. Anthony and correspondence with MWE team re same, claims investigation, mediation and strategy (.5).
B430	09/27/24	J. Haims	0.50	Correspondence with MWE team re investigation, mediation, plan and strategy (.5).
B470	09/01/24	H. Putre	5.10	Research, analyze, draft and revise memorandum re [REDACTED] issues (5.1).
B470	09/01/24	N. Bull	1.00	Correspondence with MWE team and Recovery Corp. counsel re discovery (1.0).
B470	09/01/24	J. Haims	1.00	Review and revise draft mediation statement, and correspondence with D. Simon re same (1.0).
B470	09/02/24	M. Khurana	0.30	Review and analyze ongoing and upcoming



LaVie Care Centers, LLC

Client: 120098  
Invoice: 3961515  
Invoice Date: 11/29/24

Task	Date	Name	Hours	Description
B470	09/02/24	T. Cramton	2.00	document production (.2); send correspondence to internal team re strategy for same (.1). Review and respond to correspondence re hit counts and specs on Dias/tort plaintiff emails (.8); follow up correspondence with instructions to finalize pre-production set for priv review set (.4); conference with N. Bull on upcoming meet-and-confer and discovery-related workstreams (.5); follow up correspondence with M. Khurana and H. Putre re same (.3).
B470	09/02/24	H. Putre	0.20	Review correspondence and finalize redaction coding for production set (.2).
B470	09/02/24	N. Bull	3.00	Correspondence with MWE team and Recovery Corp. counsel re discovery (1.0); revise discovery responses (2.0).
B470	09/02/24	J. Haims	0.50	Review revised draft mediation statement and correspondence re same (.5).
B470	09/03/24	H. Putre	2.30	Review correspondence (.1); conference with case team re new Aspire document review (.2); review, analyze, and perform redactions on documents in priv review set slated for production (1.4); conference with M. Khurana re same (.2); perform QC review of additional documents in same set (.4).
B470	09/03/24	T. Cramton	8.50	Attention to discovery-related items, including next steps for identifying scope and contents of TortPI/OTA emails and coordinative review (1.1); conference with MWE review team re same, including follow-up correspondence (.3); correspondence and internal discussions with MWE team following meet-and-confer with Recovery Corp. counsel on same, including follow-up correspondence and communications (.7); review and analyze emails with follow-up questions to confirm internal vs. external communications, including related calls and correspondence with E. Keil and MWE e-discovery team (1.0); review N. Bull comments and edits on R&O's to Recovery Corp. 1st RFPs and revise per same, then circulate to team with additional comments (2.6); conference with N. Bull, D. Simon, and E. Keil re response to



LaVie Care Centers, LLC

Client: 120098  
Invoice: 3961515  
Invoice Date: 11/29/24

Task	Date	Name	Hours	Description
				written discovery and next steps for document production, including follow-up correspondence to MWE e-discovery team with action items (1.2); begin drafting R&O's to Recovery Corp. RFAs and Rogs (1.6).
B470	09/03/24	D. Valentino	1.00	Promote saved search for attorney review (.3); conduct final quality control ensuring natives, text and metadata present (.5); update search index and search term reports (.2).
B470	09/03/24	M. Khurana	6.20	Review and quality check documents and emails for responsiveness and privilege issues (6.2).
B470	09/03/24	E. Kwon	1.10	Isolate new emails in the discovery document repository (.5); prepare same for case development review (.5); prepare report of same (.1).
B470	09/03/24	N. Bull	2.50	Multiple conferences with Recovery Corp., client and MWE team re strategy and discovery (2.5).
B470	09/03/24	J. Haims	1.00	Review revised draft mediation statement and correspondence with D. Simon re same (1.0).
B470	09/04/24	H. Putre	1.40	Review, analyze, and code documents in QC privilege review production set (1.2); conference with M. Khurana re same (.2).
B470	09/04/24	T. Cramton	9.90	Complete initial draft of R&O's to Recovery Corp. interrogatories and circulate with comments (4.2); update and revise R&O's to RFPs (1.5); begin drafting R&O's to RFAs (2.9); conference with D. Simon re Tort Plaintiff/OTA-related emails (.5); conferences and correspondence with case team and e-discovery team re QC and upcoming productions (.8).
B470	09/04/24	E. Kwon	2.20	Isolate external communications (.5); isolate documents for upcoming production for quality assurance review (.5); review redacted documents for quality assurance (.7); prepare documents for production (.5).
B470	09/04/24	M. Khurana	3.10	Review and quality check documents and emails for responsiveness and privilege issues (3.1).
B470	09/04/24	N. Bull	2.40	Multiple conferences and correspondence with MWE team re strategy (1.0); draft email to Recovery Corp. (.4); revise discovery responses (1.0).





LaVie Care Centers, LLC

Client: 120098  
Invoice: 3961515  
Invoice Date: 11/29/24

Task	Date	Name	Hours	Description
B470	09/05/24	H. Putre	0.20	Review correspondence and conference with team re status of two impending productions (.2).
B470	09/05/24	T. Cramton	13.70	Complete initial draft R&O's to Recovery Corp. RFAs, including iterative changes and updates to R&O's to Rogs and RFPs (4.2); circulate to team with comments on same (.2); conference with D. Simon, J. Haims, and E. Keil to review and discuss R&O's (1.3); revise RFA R&O's and re-circulate to team (2.3); conference with N. Bull re same (.5); complete additional edits on same, finalize and proof, then serve on Recovery Corp. counsel (.8); supervise and coordinate 3rd and 4th Debtor productions to Committee and Recovery Corp., including prepping and serving cover letters and transmittal emails (1.2); conferences and correspondence with N. Bull, E. Keil, and D. Simon re same (.5); complete additional edits and revisions on Rog and RFP R&O's and circulate to team with comments (2.7).
B470	09/05/24	E. Kwon	1.30	Finalize document production (.6); prepare UCC data room and additional Recovery Corporation documents for production (.6); provide access to tort plaintiff and OTA emails to Chapman (.1).
B470	09/05/24	N. Bull	3.00	Multiple conferences with MWE team and client re strategy and discovery (1.5); revise discovery responses (1.5).
B470	09/06/24	A. Garcia	2.00	Import production data and load into the review platform (.8); conduct quality control re discovery materials (1.2).
B470	09/06/24	T. Cramton	5.10	Correspondence with MWE team on upcoming mediation (.2); conference with N. Bull on comments and additional revisions for R&O's to Rogs and RFPs (.5); revise, update, and re-circulate R&O's to team with comments and plan for filings (3.5); serve R&O's on Recovery Corp. counsel (.2); internal discussions and conference with D. Simon re successor liability legal question (.3); correspondence with opposing counsel, including with request to withdraw motion to compel, plus related internal discussions with team re same (.4).





LaVie Care Centers, LLC

Client: 120098  
Invoice: 3961515  
Invoice Date: 11/29/24

Task	Date	Name	Hours	Description
B470	09/06/24	N. Bull	2.00	Conferences with MWE team and client re mediation, discovery and strategy (1.0); revise discovery responses (1.0).
B470	09/07/24	E. Kwon	0.30	Prepare OHI production documents for review (.3).
B470	09/07/24	N. Bull	0.50	Correspondence with D. Simon re mediation and related legal research (.5).
B470	09/08/24	N. Bull	2.00	Revise strategy memorandum (2.0).
B470	09/09/24	T. Cramton	7.60	Correspondence with team on mediation, including potential legal issues re privilege and assignment of claims (.3); legal research on [REDACTED], including write-up on same (2.3); respond to mediation-related inquiries (.3); follow up research re [REDACTED] (1.2); draft discovery requests per same, [REDACTED] (3.0); conferences and correspondence with N. Bull and MWE team re same (.5).
B470	09/09/24	N. Bull	7.40	Prepare for mediation, including conferences with MWE team, client and Synergy counsel (2.0); participate in mediation and related discussions (5.0); conference and correspondence with T. Cramton re discovery (.4).
B470	09/10/24	T. Cramton	8.40	Revise and re-circulate draft discovery requests to Recovery Corp. re Florida structured settlement statute (.6); additional legal research on same, including to confirm statute's applicability (2.2); correspondence with MWE team re Florida structured statute (.5); additional revisions and updates on discovery requests, [REDACTED] (1.8); research re same (1.1); conference and correspondence with N. Bull re discovery requests (.3); finalize and serve discovery requests on Recovery Corp. counsel (.5); begin drafting legal memo re [REDACTED] (1.4).
B470	09/10/24	N. Bull	8.00	Multiple conferences with MWE team, client, Committee counsel and sponsor's counsel re



LaVie Care Centers, LLC

Client: 120098  
Invoice: 3961515  
Invoice Date: 11/29/24

Task	Date	Name	Hours	Description
				mediation and settlement (6.0); review legal research re [REDACTED] and related conferences with MWE team (1.0); revise draft discovery (1.0).
B470	09/11/24	T. Cramton	10.80	Prep and draft legal analysis of impact of Recovery Corp. non-compliance with Florida structured settlement statute, including legal research and analysis of [REDACTED] (6.9); conference with MWE team on update from mediation and discussions with Recovery Corp. counsel on statutory non-compliance (.7); conferences and correspondence with MWE team on research [REDACTED] (1.0);
B470	09/11/24	N. Bull	10.00	conference with E. Keil re same and discovery requests (.5); draft supplemental R&O's to Recovery Corp. interrogatories, including on valuation (1.7). Prepare for and attend mediation with MWE team, client, sponsor's counsel and Committee counsel (8); review and revise supplemental interrogatories (.5); confer with MWE team and Recovery Corp. re standing issues (1.5).
B470	09/12/24	N. Bull	2.00	Conferences with client and MWE re mediation and strategy (1.5); revise discovery requests (.5).
B470	09/12/24	T. Cramton	7.40	Prepare second set of discovery requests to Recovery Corp. re failure to obtain court approval for assignments under Florida law and duplicative proofs of claim, including based on review of filed POCs, then circulate to team with comments (4.2); review Fed. Bankr. and Local Rules re certificates of service and circulate findings/analysis on same (.5); review and analyze legal research [REDACTED] (1.2); additional edits and updates on second set of discovery requests, including supplemental first set of rog responses, then finalize and serve same (1.5).
B470	09/13/24	T. Cramton	7.30	Revise, finalize and serve Debtors' 2nd set of discovery request to Recovery Corp., including



LaVie Care Centers, LLC

Client: 120098  
Invoice: 3961515  
Invoice Date: 11/29/24

Task	Date	Name	Hours	Description
				conferences and correspondence with N. Bull and MWE team on same (3.0); revise, finalize, and coordinate filing of Certificate of Service for initial discovery requests on Recovery Corp. (.5); prepare and send email memo to MWE team re response to Recovery Corp. motion to compel (2.5); correspondence with Recovery Corp. counsel with request to withdraw motion to compel, including follow-up correspondence and discussions with MWE team (1.0); coordinate with MWE e-discovery team to set up sample review of TortPl/OTA emails (.3).
B470	09/13/24	E. Kwon	0.90	Isolate documents for review (.7); prepare sample set for organized review (.2).
B470	09/13/24	N. Bull	5.90	Multiple conferences with MWE team re mediation, strategy and discovery (2.5); review supplemental motion to compel (.5); revise discovery requests (.5); correspondence with opposing counsel re discovery issues (.4); draft letter to Recovery Corp. (2.0).
B470	09/14/24	T. Cramton	4.70	Legal research and analysis on issues relating to Recovery Corp. motion to compel, including write-up on findings and recommendations (3.0); conference with MWE team re same, plus Recovery Corp. standing issues and next steps (1.0); prepare MWE letter to Recovery Corp. and circulate to team, including follow-up on same (.7).
B470	09/14/24	N. Bull	2.00	Conferences and correspondence with T. Cramton, D. Simon and E. Keil re Recovery Corp., discovery and strategy (2.0).
B470	09/15/24	T. Cramton	0.50	Correspondence with team on letter to Recovery Corp., including review transmittal email and letter served (.5).
B470	09/15/24	N. Bull	1.00	Correspondence with MWE team re Recovery Corp. and strategy (.5); correspondence with Recovery Corp. counsel (.5).
B470	09/16/24	T. Cramton	9.20	Draft and legal research on Debtors' response in opposition to Recovery Corp. motion to compel/supplemental motion to compel (8.3); review and analyze Recovery Corp. standing



LaVie Care Centers, LLC

Client: 120098  
Invoice: 3961515  
Invoice Date: 11/29/24

Task	Date	Name	Hours	Description
				motion, including correspondence and internal discussions with MWE team (.5); coordinate filing of certificate of service for second set of discovery requests to Recovery Corp. (.3); emails with team re Omega 9.16.2024 production (.1).
B470	09/16/24	E. Kwon	0.50	Assist with preparing for indexing review of recently identified documents for review (.2); coordinate preparing new OHI production documents for review (.3).
B470	09/16/24	N. Bull	1.50	Multiple conferences with MWE team and client re discovery and strategy (1.5).
B470	09/17/24	T. Cramton	10.80	Complete initial draft of Debtors response in opposition to Recovery Corp. motion to compel (10.1); correspondence with MWE team re settlement discussions with Recovery Corp. (.3); comment and review on Debtors draft disclosure statement re Florida statute and Recovery Corp. standing, including follow-up review of N. Bull comments (.4).
B470	09/17/24	A. Garcia	1.00	Import production data and load into the review platform (.4); conduct quality control re discovery materials (.6).
B470	09/17/24	E. Kwon	0.20	Review new OHI production documents in the discovery document repository for quality assurance (.2).
B470	09/17/24	N. Bull	1.50	Multiple conferences with MWE team (1.5)
B470	09/18/24	H. Putre	0.20	Analyze docket, set up alert, and conference with team re possible activity in Miami case docket (.2).
B470	09/18/24	T. Cramton	10.20	Additional updates and edits to opposition to Recovery Corp. motion to compel, including incorporating cites from amended disclosure/plan (.5); re-circulate same with comments (.1); review and analyze amended disclosure statement and plan, including internal discussions with E. Keil (2.6); conference with N. Bull on motion to compel and next steps re Recovery Corp. (.4); correspondence with MWE e-discovery team to set up parameters for sample reviews of settlement and OTA-related emails (.5); complete review of 1000 sample docs per same (5.5); prepare and send report with analysis



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LaVie Care Centers, LLC

Client: 120098  
Invoice: 3961515  
Invoice Date: 11/29/24

Task	Date	Name	Hours	Description
				and observations of same with docs of interest, including follow-up emails with MWE team on same (.6).
B470	09/18/24	A. Chatham	0.60	Conference with N. Bull and D. Simon re recently filed state-court complaint in Brandon litigation (.6).
B470	09/18/24	E. Kwon	0.30	Assist with review of sample set documents (.3).
B470	09/18/24	N. Bull	4.00	Multiple conferences with D. Simon, T. Cramton and A. Chatham re strategy, discovery, and adversary proceeding (2.0); review new complaint (.4); review documents (.6); review legal research (1.0).
B470	09/19/24	H. Putre	0.20	Analyze docket for developments and conference with N. Bull re same (.2).
B470	09/19/24	T. Cramton	8.40	Review and coding for approximately 1000+ NSpire settlement-related docs and emails, including correspondence and internal discussions with MWE e-discovery team (2.9); conference with N. Bull re discovery and upcoming meet-and-confer with Recovery Corp. (.3); meet and confer with Recovery Corp. (1.3); follow up conference on same with N. Bull (.3); run targeted searches and review and analyze findings for potential productions re OTAs/claimants (.8); prepare and send follow-up correspondence on same, plus notes from meet-and-confer, to MWE team with comments (.5); conference with MWE team on Recovery Corp. strategy re standing and motion to compel, including follow-up call with N. Bull (1.5); legal research re motion to strike (.8).
B470	09/19/24	E. Kwon	0.90	Assist with review of sample set documents (.3); prepare document production (.6).
B470	09/19/24	N. Bull	4.20	Multiple conferences with MWE team and client re strategy, settlement and Recovery Corp. (2.5); prepare for and meet and confer with Recovery Corp. (.8); review documents (.5); review Recovery Corp. correspondence (.4).
B470	09/20/24	H. Putre	0.10	Review Miami docket for anticipated breach of stay (.1).
B470	09/20/24	T. Cramton	10.30	Draft, legal and factual research, and revising to convert [REDACTED]





LaVie Care Centers, LLC

Client: 120098  
Invoice: 3961515  
Invoice Date: 11/29/24

Task	Date	Name	Hours	Description
				[REDACTED]
				(9.8); prepare cover letters for pending 5th production, plus related correspondence with MWE team and e-discovery team re same (.5).
B470	09/20/24	E. Kwon	1.10	Finalize document production (1.1).
B470	09/20/24	N. Bull	5.00	Multiple conferences with MWE team re strategy (1.5); review documents (.5); revise opposition to motion to compel (3).
B470	09/21/24	T. Cramton	6.00	Complete initial draft of Debtors' motion to strike/cross-motion to compel and send to N. Bull with comments (5.2); conferences with N. Bull re case updates on settlement and next steps with Recovery Corp., including motion to strike (.8).
B470	09/21/24	N. Bull	2.00	Multiple conferences and correspondence with D. Simon and T. Cramton re Recovery Corp. and strategy (2.0).
B470	09/22/24	N. Bull	2.50	Revise motion to strike and opposition to motion to compel (2.5).
B470	09/23/24	H. Putre	0.10	Review Florida docket for activity (.1).
B470	09/23/24	T. Cramton	8.70	Follow up legal research on [REDACTED] (1.4); conference with D. Simon, C. Lee, and E. Keil re vacate motion (1.0); legal research on [REDACTED], including conference with E. Keil and write-up on same (3.5); update cover letter and serve Debtors' 5th production, including coordinating with e-discovery team re same (.5); attention to document discovery, including coordinating with e-discovery team to run Recovery Corp. proposed search terms over email collections, plus analysis on same (1.5); correspondence with MWE team and opposing counsel re Recovery Corp. (.4); follow up legal research on [REDACTED] (.4).
B470	09/23/24	N. Bull	6.50	Multiple conferences with MWE team and sponsor counsel re discovery, Recovery Corp., strategy and Brandon litigation (3.0); revise draft motion papers re Recovery Corp. (2.5); review legal research re same (1.0).



LaVie Care Centers, LLC

Client: 120098  
Invoice: 3961515  
Invoice Date: 11/29/24

Task	Date	Name	Hours	Description
B470	09/23/24	E. Kwon	0.50	Finalize document production (.2); identify additional potentially relevant documents (.2); prepare reports of same (.1).
B470	09/24/24	H. Putre	0.10	Review docket for filing in violation of stay (.1).
B470	09/24/24	T. Cramton	8.10	Additional legal analysis and research on [REDACTED] (4.6); design search protocols for document discovery, including emails and internal discussions with N. Bull and MWE e-discovery team, including review and analysis of STR hit reports (2.3); review N. Bull edits and comments on background section of motion to strike, including additional edits and revisions per same (1.2).
B470	09/24/24	A. Chatham	0.30	Conference with N. Bull, D. Simon and Synergy counsel re Brandon litigation (.3).
B470	09/24/24	E. Kwon	1.90	Finalize document production (1.0); identify additional potentially relevant documents (.7); prepare reports of same (.2).
B470	09/24/24	N. Bull	6.50	Multiple conferences with MWE team and sponsor counsel re strategy and discovery (1.0); review legal research (2.0); revise motion to strike and opposition to motion to compel (3.5).
B470	09/25/24	T. Cramton	8.70	Review, analyze and update report and recommendations for discovery/document production, and send to N. Bull with comments (1.5); catalog MWE document collection inventory and productions per J. Watson request and send to E. Keil with comments (1.5); conference with N. Bull to discuss discovery protocol and motion to strike (1.2); complete additional revisions on background for motion (1.3); review N. Bull edits and comments on updated motion to strike, then incorporate additional edits and revisions before circulating same (2.7); preliminary review of draft opposition to standing motion (.5).
B470	09/25/24	N. Bull	9.50	Revise motion to strike and compel (8.5); multiple conferences with MWE team re discovery and Recovery Corp. motions (1.0).
B470	09/26/24	T. Cramton	9.50	Review D. Simon's comments and proposed revisions on draft motion to strike (.7); conference





LaVie Care Centers, LLC

Client: 120098  
Invoice: 3961515  
Invoice Date: 11/29/24

Task	Date	Name	Hours	Description
				with D. Simon, N. Bull, and E. Keil to discuss comments and edits on draft motion, plus additional case strategy and discovery-related issues, including prep for same (1.6); revisions and updates on draft motion per same, including follow-up legal research and internal discussions with MWE team on same (3.8); prepare proposed order for same, including discussions with E. Keil on same (.5); finalize draft motion and proposed order per N. Bull comments and edits, and circulate same to team (1.4); legal research on [REDACTED] [REDACTED] including write-up with analysis and follow-up correspondence with N. Bull re same (1.5).
B470	09/26/24	N. Bull	6.00	Review D. Simon's comments and proposed revisions on draft motion to strike (.7); conference with D. Simon, N. Bull, and E. Keil to discuss comments and edits on draft motion, plus additional case strategy and discovery-related issues, including prep for same (1.6); revisions and updates on draft motion per same, including follow-up legal research and internal discussions with MWE team on same (3.8); prepare proposed order for same, including discussions with E. Keil on same (.5); finalize draft motion and proposed order per N. Bull comments and edits, and circulate same to team (1.4); legal research on [REDACTED] [REDACTED] including write-up with analysis and follow-up correspondence with N. Bull re same (1.5).
B470	09/27/24	T. Cramton	5.30	Finalize motion to strike filing papers, including review and incorporating edits from N. Bull and D. Simon on same, along with conference with N. Bull (4.7); prepare exhibits and coordinate filing for same, including review of file-stamped copies (.6).
B470	09/27/24	A. Chatham	2.90	Review and analyze recently filed state court complaint re Brandon facilities (1.4); review analysis from C. Lee re application of automatic stay



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LaVie Care Centers, LLC

Client: 120098  
Invoice: 3961515  
Invoice Date: 11/29/24

Task	Date	Name	Hours	Description
				to actions against non-debtor parties (.5); draft correspondence to plaintiffs' counsel re stay of state court proceedings and potential violation of automatic stay (1.0).
B470	09/27/24	N. Bull	3.50	Multiple conferences with MWE team and client re motion to strike, Brandon litigation and strategy (2.0); revise and finalize motion to strike and opposition to motion to compel (1.5).
B470	09/28/24	T. Cramton	0.50	Preliminary review of updated objection to Recovery Corp. standing motion, including correspondence with MWE team and internal discussions with E. Keil re same (.5).
B470	09/28/24	N. Bull	0.50	Conference with D. Simon re settlement and strategy (.5).
B470	09/29/24	A. Chatham	1.40	Draft and revise letter to plaintiffs' counsel in Brandon litigation re stay violation (1.4).
B470	09/29/24	N. Bull	3.40	Prepare memorandum for disclosure hearing (.5); revise objection to Recovery Corp.'s standing motion (1.0); review plan disclosure (.5); revise correspondence to Brandon plaintiffs (.4); prepare for hearing on motion to strike (1.0).
B470	09/30/24	T. Cramton	2.00	Review and respond to MWE team correspondence re upcoming hearing, including providing comments on discovery to date (.4); review and analyze updated draft objection to Recovery Corp. standing motion, including sending additional comments (.4); preliminary review and analysis of Recovery Corp. objection to plan, disclosure statement, and proposed settlement (.6); follow up conferences with N. Bull on Recovery Corp. assignment and Florida statute application (.6).
B470	09/30/24	H. Putre	0.10	Analyze docket for recent filings and conference with team re same (.1).
B470	09/30/24	A. Chatham	1.00	Draft letter to plaintiff's counsel in Izzo state court matter re violation of automatic stay (1.0).
B470	09/30/24	N. Bull	6.00	Multiple conferences with MWE team re Recovery Corp. and Brandon litigation (1.5); review legal research and pleadings (2.0); prepare for motion to strike hearing (2.5).



LaVie Care Centers, LLC

Client: 120098  
 Invoice: 3961515  
 Invoice Date: 11/29/24

Task	Date	Name	Hours	Description
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**Total Hours 977.00**

### Timekeeper Summary

Name	Hours	Rate	Amount
J. Bishop Jones	0.80	360.00	288.00
N. Bull	123.60	1,650.00	203,940.00
A. Chatham	6.20	1,525.00	9,455.00
T. Cramton	185.40	1,290.00	239,166.00
L. Foody	6.10	1,040.00	6,344.00
A. Garcia	3.00	280.00	840.00
J. Haake	61.20	1,335.00	81,702.00
J. Haims	17.30	1,830.00	31,659.00
J. Jumbeck	3.20	1,245.00	3,984.00
E. Keil	211.60	1,245.00	263,442.00
M. Khurana	9.60	805.00	7,728.00
E. Kwon	11.20	570.00	6,384.00
C. Lee	55.90	1,155.00	64,564.50
D. Northrop	15.20	745.00	11,324.00
H. Putre	10.00	925.00	9,250.00
D. Ratnoff	6.70	805.00	5,393.50
N. Rowles	7.10	1,245.00	8,839.50
D. Simon	198.50	1,650.00	327,525.00
A. Spisak	7.80	1,245.00	9,711.00
R. Trickey	34.50	925.00	31,912.50
D. Valentino	1.00	280.00	280.00
C. Zhu	1.10	1,040.00	1,144.00
<b>Totals</b>	<b>977.00</b>		<b>\$1,324,876.00</b>

### Task Code Summary

Task Code	Description	Hours	Amount
B110	Case Administration	3.20	3,092.00
B130	Asset Disposition	9.30	13,551.50
B140	Relief from Stay/Adequate Protection Proceedings	50.40	58,333.00



LaVie Care Centers, LLC

Client: 120098  
Invoice: 3961515  
Invoice Date: 11/29/24

Task Code	Description	Hours	Amount
B150	Mtgs/Communications w/Creditor	1.60	1,992.00
B155	Court Hearings	22.30	31,648.00
B160	Fee/Employment Applications	2.40	2,988.00
B185	Assumption/Rejection of Leases	9.80	10,961.50
B190	Other Contested Matters	224.70	312,194.00
B195	Non-Working Travel	10.50	15,016.50
B210	Business Operations	4.30	5,704.00
B220	Employee Benefits/Pensions	3.00	3,969.00
B230	Financing/Cash Collections	41.40	48,256.50
B240	Tax Issues	1.00	1,317.00
B270	Utilities	1.20	1,602.00
B280	Vendor Matters	0.90	1,174.50
B290	Insurance	2.30	2,290.50
B310	Claims Administration & Object	6.90	5,642.50
B320	Plan and Disclosure Statement	216.40	302,475.00
B430	Internal Investigation	23.00	37,067.50
B470	Litigation	342.40	465,601.00
		977.00	1,324,876.00

**EXHIBIT B**

**Expense Detail**



**McDermott  
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LaVie Care Centers, LLC

Client: 120098  
Invoice: 3961515  
Invoice Date: 11/29/24

## Costs and Other Charges

Description	Amount
Business Meal	19.08
Meal on 9/8/2024 (E. Keil)	
Business Meal	799.93
Dinner meals on 9/9/2024 (D. Simon, B. Jones, R. Ahmed R. Perry, J. Decker, L. Halperin, E. Keil and N. Bull)	
Business Meal	23.54
Meal on 9/10/2024 (E. Keil)	
Business Meal	27.86
Lunch meal for LaVie auction on 9/11/2024	
Business Meal	24.23
Dinner meal on 9/30/2024 (E. Keil)	
Business Meal	34.67
Lunch meal on 9/30/2024 to prepare for and attend LaVie hearing (D. Simon)	
Computer Research	7,383.22
Computer Research	
Computer Usage Charge - Data Review & Production Software	6,000.00
"September monthly fee for Discovery Platform Use (RelativityOne, 557.50 GBs)"	
Court Fees	100.00
VENDOR: US District Court Northern District of Georgia; INVOICE#: TCRAMTON-091124; DATE: 9/11/2024 - Filing fee for Timothy Cramton's application for admission pro hac vice	
Document Services	102.00
VENDOR: eScribers LLC; INVOICE#: 1029422; DATE: 9/20/2024 - obtain transcript of status hearing held on September 17, 2024, in In re LaVie Care Centers, LLC, et al., Case No. 24-55507 (PMB) (U.S. Bankruptcy Court for the Northern District of Georgia)	
Express Mail	26.54
VENDOR: Federal Express Corporation; INVOICE#: 862238611; DATE: 9/17/2024	
Messenger/Courier	25.20
VENDOR: Georgia Messenger Service LLC; INVOICE#: 8547-224; DATE: 9/14/2024 - pro hac (D. Northrop)	
Messenger/Courier	587.92
VENDOR: ezCater, Inc.; INVOICE#: INVE-44551; DATE: 9/15/2024 - LaVie auction	
Messenger/Courier	446.80
VENDOR: ezCater, Inc.; INVOICE#: INVE-44551; DATE: 9/15/2024 - LaVie auction	
Messenger/Courier	359.90
VENDOR: ezCater, Inc.; INVOICE#: INVE-44551; DATE: 9/15/2024 - LaVie auction	
Messenger/Courier	467.62
VENDOR: ezCater, Inc.; INVOICE#: INVE-44551; DATE: 9/15/2024 - LaVie auction	
Search Fees	84.43



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LaVie Care Centers, LLC

Client: 120098  
Invoice: 3961515  
Invoice Date: 11/29/24

Description	Amount
VENDOR: Chapter 11 Dockets; INVOICE#: 138030; DATE: 9/3/2024 - Searches run in August 2024	
Search Fees	97.92
VENDOR: Chapter 11 Dockets; INVOICE#: 138030; DATE: 9/3/2024 - searches run in August 2024	
Travel Expenses	543.47
Travel from DTW to Atlanta, GA for client meetings on 9/8/2024 (E. Keil)	
Travel Expenses	43.06
Lyft ride from Atlanta airport to hotel on 9/8/2024 (E. Keil)	
Travel Expenses	45.25
Lyft ride from Atlanta airport to hotel on 9/9/2024 (N. Bull)	
Travel Expenses	15.14
Lyft ride from client meetings to hotel on 9/9/2024 (E. Keil)	
Travel Expenses	40.96
Lyft ride to Miami airport on 9/9/2024 (N. Bull)	
Travel Expenses	309.48
Airfare from Miami, FL to Atlanta, GA on 9/9/2024 for mediation (N. Bull)	
Travel Expenses	18.80
Lyft ride from hotel to MWE Atlanta office on 9/9/2024 (N. Bull)	
Travel Expenses	1,109.71
Hotel stay on 9/9/2024 to 9/12/2024 re mediation (N. Bull)	
Travel Expenses	126.65
Dinner meal at hotel on 9/10/2024 (N. Bull)	
Travel Expenses	141.52
Dinner meal at hotel on 9/11/2024 (N. Bull)	
Travel Expenses	478.48
Travel from Atlanta, GA to ORD following client meetings on 9/11/2024 (E. Keil)	
Travel Expenses	25.97
Uber ride from hotel to Atlanta, GA airport on 9/11/2024 (E. Keil)	
Travel Expenses	1,404.08
Hotel accommodation in Atlanta, GA for client meetings on September 9 -12, 2024 (E. Keil)	
Travel Expenses	35.37
Lyft ride from Miami airport to home on 9/12/2024 (N. Bull)	
Travel Expenses	289.13
Airfare from Atlanta, GA to Miami, FL on 9/12/2024 following mediation (N. Bull)	
Travel Expenses	40.90
Lyft ride from hotel to Atlanta airport on 9/12/2024 (N. Bull)	
Travel Expenses	37.74





LaVie Care Centers, LLC

Client: 120098  
Invoice: 3961515  
Invoice Date: 11/29/24

Description	Amount
Lyft ride to ORD on 9/29/2024 (E. Keil)	
Travel Expenses	8.00
Airplane Wifi in flight on 9/29/2024 (E. Keil)	
Travel Expenses	415.47
Airfare to Atlanta, GA on 9/29/2024 (E. Keil)	
Travel Expenses	35.59
Lyft ride from Atlanta airport to hotel on 9/30/24 (E. Keil)	
<b>Total Costs and Other Charges</b>	<b>\$21,775.63</b>

**EXHIBIT A-5**

**Fifth Monthly Fee Statement**  
***October 1, 2024 – October 31, 2024***

**IN THE UNITED STATES BANKRUPTCY COURT  
NORTHERN DISTRICT OF GEORGIA  
ATLANTA DIVISION**

In re:	)	
	)	Chapter 11
	)	
LAVIE CARE CENTERS, LLC, <i>et al.</i> ,	)	Case No. 24-55507 (PMB)
	)	
Debtors. <sup>1</sup>	)	(Jointly Administered)
	)	
	)	<b>Obj. Deadline: January 23, 2025</b>
	)	

**SUMMARY OF FIFTH MONTHLY FEE STATEMENT OF  
MCDERMOTT WILL & EMERY LLP, COUNSEL TO THE DEBTORS AND  
DEBTORS-IN-POSSESSION, FOR ALLOWANCE OF COMPENSATION AND  
REIMBURSEMENT OF EXPENSES FOR THE PERIOD  
FROM OCTOBER 1, 2024 THROUGH OCTOBER 31, 2024**

Name of Applicant:	<b>McDERMOTT WILL &amp; EMERY LLP</b>
Authorized to provide professional services to:	<b>Debtors and Debtors-in-Possession</b>
Date of retention:	<b>July 19, 2024, effective as of June 2, 2024</b>
Period for which compensation and reimbursement is sought:	<b>October 1, 2024 through October 31, 2024</b>
Amount of compensation sought as actual, reasonable and necessary:	<b>\$797,891.50</b>
Amount of expense reimbursement sought as actual, reasonable and necessary:	<b>\$18,551.53</b>
This is a:	<b>Fifth Monthly Fee Statement</b>

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<sup>1</sup> The last four digits of LaVie Care Centers, LLC's federal tax identification number are 5592. There are 282 Debtors in these chapter 11 cases, which are being jointly administered for procedural purposes only. A complete list of the Debtors and the last four digits of their federal tax identification numbers are not provided herein. A complete list of such information may be obtained on the website of the Debtors' claims and noticing agent at <https://www.veritaglobal.net/LaVie>. The location of LaVie Care Centers, LLC's corporate headquarters and the Debtors' service address is 1040 Crown Pointe Parkway, Suite 600, Atlanta, GA 30338.

**Prior Fee Statements:**

<b>Document</b>	<b>Date Served</b>	<b>Period Covered</b>	<b>Requested Fees/Expenses</b>	<b>Objections Served</b>
<b>First Monthly Fee Statement</b>	August 26, 2024	6/2/24 – 6/30/24	\$1,692,647.00 / \$38,882.94	None
<b>Second Monthly Fee Statement</b>	October 3, 2024	7/1/24 – 7/31/24	\$1,036,973.50 / \$13,899.83	None
<b>Third Monthly Fee Statement</b>	November 11, 2024	8/1/24 – 8/31/24	\$1,383,682.50 / \$23,579.78	None
<b>Fourth Monthly Fee Statement</b>	December 3, 2024	9/1/24 – 9/30/24	\$1,324,876.00 / \$21,775.63	None

**LAVIE CARE CENTERS, LLC, ET AL.  
SUMMARY OF BILLING BY PROFESSIONAL  
OCTOBER 1, 2024 THROUGH OCTOBER 31, 2024**

<b>Name of Professional Person</b>	<b>Date of Bar Admission</b>	<b>Position with the Applicant and Practice Area</b>	<b>Hourly Billing Rate</b>	<b>Total Billed Hours</b>	<b>Total Compensation</b>
Gary Karch	1980	Counsel; U.S. & International Tax	\$2,210	0.7	\$1,547.00
Daniel M. Simon	2008	Partner; Corporate Advisory	\$1,650	100.8	\$166,320.00
Nathan M. Bull	2006	Partner; Trial	\$1,650	108.9	\$179,685.00
Asra Chatham	2011	Partner; Trial	\$1,525	1.3	\$1,982.50
Jack G. Haake	2011	Associate; Corporate Advisory	\$1,335	44.4	\$59,274.00
Tim C. Cramton	2018	Associate; Trial	\$1,290	110.6	\$142,674.00
Alex Spisak	2014	Associate; Trial	\$1,245	8.9	\$11,080.50
Emily C. Keil	2018	Associate; Corporate Advisory	\$1,245	119.7	\$149,026.50
Catherine T. Lee	2021	Associate; Corporate Advisory	\$1,155	26.2	\$30,261.00
Hayden Putre	2021	Associate; Trial	\$925	18.9	\$17,482.50
Rebecca E. Trickey	2022	Associate; Corporate Advisory	\$925	5.1	\$4,717.50
Milind Khurana	2023	Associate; Trial	\$805	11.4	\$9,177.00
Daniel Northrop	N/A	Paralegal; Corporate Advisory	\$745	17.2	\$12,814.00
Benjamin Casten	N/A	Discovery Consultant	\$690	1.8	\$1,242.00
Christine Gelat	2000	Discovery Counsel	\$590	0.8	\$472.00

<b>Name of Professional Person</b>	<b>Date of Bar Admission</b>	<b>Position with the Applicant and Practice Area</b>	<b>Hourly Billing Rate</b>	<b>Total Billed Hours</b>	<b>Total Compensation</b>
Edward Kwon	N/A	Manager of Technology Project Management	\$570	14.6	\$8,322.00
Scott Bride	N/A	Senior Researcher	\$385	2.0	\$770.00
Jacque Bishop Jones	N/A	Paralegal; Corporate Advisory	\$360	1.5	\$540.00
Daniel Valentino	N/A	Litigation Technology Data Analyst	\$280	1.8	\$504.00
<b>TOTALS</b>				<b>596.6</b>	<b>\$797,891.50</b>

**LAVIE CARE CENTERS, LLC, ET AL.  
COMPENSATION BY PROJECT CATEGORY  
OCTOBER 1, 2024 THROUGH OCTOBER 31, 2024**

<b>Project Category</b>	<b>Total Hours</b>	<b>Total Fees</b>
Asset Disposition	0.2	\$149.00
Relief from Stay / Adequate Protection Proceedings	34.4	\$42,001.50
Meetings/Communications with Creditors	2.8	\$3,585.00
Court Hearings	54.8	\$80,043.00
Fee/Employment Applications	5.2	\$5,624.00
Assumption/Rejection of Leases	6.9	\$8,496.00
Other Contested Matters	97.5	\$143,048.50
Non-Working Travel <sup>2</sup>	10.6	\$15,186.00
Business Operations	4.4	\$5,230.50
Financing/Cash Collections	2.2	\$2,660.00
Tax Issues	0.7	\$1,547.00
Vendor Matters	5.5	\$7,342.50
Insurance	12.6	\$16,380.00
Claims Administration & Objections	4.6	\$4,411.00
Plan and Disclosure Statement	109.9	\$144,846.50
Litigation	244.3	\$317,341.00
<b>TOTALS</b>	<b>596.6</b>	<b>\$797,891.50</b>

<sup>2</sup> The hours billed to Non-Working Travel were reduced by fifty percent (50%), as reflected in the time detail attached hereto as **Exhibit A**.



**LAVIE CARE CENTERS, LLC, ET AL.  
EXPENSE SUMMARY  
OCTOBER 1, 2024 THROUGH OCTOBER 31, 2024**

<b>Expense Category</b>	<b>Service Provider (if applicable)</b>	<b>Total Expenses</b>
Computer-Assisted Research	Various	\$5,388.84
Transcripts	Various	\$1,539.12
Travel Expenses	Various	\$5,463.53
Business Meals	Various	\$160.04
Discovery Hosting Charges	RelativityOne	\$6,000.00
<b>TOTAL</b>		<b>\$18,551.53</b>

**EXHIBIT A**

**Time Detail**



Invoice: 3973790  
Client: 120098

12/31/24

LaVie Care Centers, LLC  
1040 Crown Pointe Parkway  
Atlanta, GA 30338

For Services Rendered in Connection with:

Matter: 0013 Chapter 11

Task	Date	Name	Hours	Description
B130	10/30/24	D. Northrop	0.20	File notice of supplement to revised list of potentially assumed executory contracts and unexpired leases and related cure costs (.2).
B140	10/02/24	R. Trickey	1.00	Research issues re [REDACTED] (.7); correspond with J. Haake re same (.3).
B140	10/02/24	D. Simon	0.80	Review response on stay relief (.4); conferences with J. Haake re same (.4).
B140	10/03/24	A. Spisak	1.20	Review insurance policies in connection with motion to lift stay (1.2).
B140	10/03/24	R. Trickey	1.90	Prepare witness and exhibit list for lift stay hearing (.3); review and revise proposed consent order re motion to lift stay (1.3); conference with J. Haake re same (.3).
B140	10/03/24	J. Haake	0.50	Correspondence and conferences with P. Rubin and R. Trickey re agreed lift stay order (.5).
B140	10/03/24	D. Northrop	0.10	Review notice of withdrawal of UCC's objection to Debtors' motion for limited relief from the automatic stay to permit Debtor Donegan Square Health Care Associates, LLC to perform under AHCA agreement, and correspondence with MWE team re same (.1).
B140	10/03/24	D. Simon	0.70	Conference with J. Watson and D. Thomas re relief from stay matters (.4); conference with J. Haake re same (.3).
B140	10/04/24	J. Haake	0.40	Correspondence with D. Simon and J. Watson re lift stay issues (.4).
B140	10/05/24	J. Haake	2.10	Prepare for contested hearing re lift stay motions (1.9); correspondence with D. Simon re same (.2).
B140	10/07/24	J. Haake	2.00	Review agreed order re Lamana lift stay motion (.4); prepare for hearing (.8); conferences with J. Rezac and F. Nason re hearing (.5); conference with E.



LaVie Care Centers, LLC

Client: 120098  
Invoice: 3973790  
Invoice Date: 12/31/24

Task	Date	Name	Hours	Description
B140	10/07/24	D. Simon	0.80	Quinn re lift stay hearing (.3). Meetings with J. Haake re motion for relief from stay matters (.8).
B140	10/08/24	J. Haake	0.90	Prepare for and participate in conference with F. Lawall re lift stay motions and orders (.7); revise draft lift stay order (.2).
B140	10/08/24	R. Trickey	2.20	Review and redact insurance policies (.4); correspond with J. Haake and D. Northrop re redacted policies (.2); draft Occilien lift stay motion (.8); research issues re [REDACTED] (.8).
B140	10/08/24	D. Simon	0.40	Conference with Committee re relief from stay matters (.4).
B140	10/09/24	J. Haake	2.80	Prepare for and participate in conference with F. Lawall re lift stay motions (.6); conference with F. Nason re same (.5); prepare for and participate in conference with N. Brannick re same (.8); prepare for and participate in conference with C. Webb re insurance and lift stay issues (.9).
B140	10/09/24	D. Northrop	0.20	Review (i) notice of rescheduled hearing on Ormond motion to modify stay and (ii) notice rescheduling hearing on motion of A. Almonte for relief from the automatic stay (.1); correspondence with MWE team re same (.1).
B140	10/09/24	D. Simon	0.70	Multiple conferences with Committee and Moran's re lift stay matters (.7).
B140	10/12/24	A. Spisak	1.00	Review insurance policies in connection with motion to lift stay (1.0).
B140	10/12/24	D. Northrop	0.10	Review Official Committee of Unsecured Creditors' joinder to Debtors' omnibus objection to motions for relief from automatic stay and correspondence with MWE team re same (.1).
B140	10/14/24	D. Northrop	0.80	Review insurance policies and mark same as confidential (in preparation for sharing same with opposing counsel) (.7).
B140	10/16/24	J. Haake	1.50	Prepare for and participate in conference with F. Lawall and N. Brannick re Iezzoni lift stay motion settlement of same (1.5).
B140	10/16/24	D. Northrop	0.20	Review motion of William Burnham to modify or lift the automatic stay to liquidate personal injury



LaVie Care Centers, LLC

Client: 120098  
Invoice: 3973790  
Invoice Date: 12/31/24

Task	Date	Name	Hours	Description
				tort claim in pending litigation against 4641 Old Canoe Creek Road Operations, LLC, and related notice of hearing (.1); correspondence with MWE team re same (.1).
B140	10/18/24	J. Haake	0.90	Prepare for and participate in conference with T. Brink re insurance issues (.3); review insurance documents (.2); conference with D. Simon re insurance issues (.2); correspondence with F. Lawall re insurance and case issues (.2).
B140	10/18/24	D. Simon	0.50	Conference with J. Haake re stay relief and insurance issues (.5).
B140	10/18/24	D. Northrop	0.70	Review insurance policies and mark same as confidential and redact premium information therein (in preparation for sharing same with opposing counsel) (.7).
B140	10/22/24	A. Spisak	1.20	Review insurance policies in connection with various motions to lift stay (1.2).
B140	10/24/24	C. Lee	1.70	Review and analyze lift stay motion, case law re same (1.0); draft objection to same (.6); correspond with J. Haake re same (.1).
B140	10/25/24	C. Lee	3.90	Review and revise objection to lift stay motion (3.1); review and analyze underlying insurance re same (.5); conference and correspond with J. Haake re same (.3).
B140	10/26/24	J. Haake	1.00	Revise objection to lift stay motion (.8); correspondence with K. Listwak re same (.2).
B140	10/28/24	A. Spisak	1.50	Review insurance policies and provide information to client in connection with motions to lift stay (1.5).
B140	10/28/24	C. Lee	0.10	Correspond with J. Haake re lift stay objection (.1).
B140	10/29/24	D. Northrop	0.50	Finalize Debtors' objection to Burnham lift stay motion for filing (.1); file same (.2); review (i) Committee joinder to Debtors' objection to Burnham lift stay motion and (ii) amended notice of hearing on Burnham lift stay motion (.1); correspondence with MWE team re same (.1).
B140	10/31/24	D. Northrop	0.10	Review notice of hearing on motion of Mary Ann Iezzoni, as agent-in-fact for Angeline Lamana, for relief from the automatic stay, and correspondence with MWE team re same (.1).
B150	10/09/24	E. Keil	0.20	Correspondence with taxing authority (.2).



LaVie Care Centers, LLC

Client: 120098  
Invoice: 3973790  
Invoice Date: 12/31/24

Task	Date	Name	Hours	Description
B150	10/14/24	E. Keil	0.70	Correspondence with Access re medical records (.5); correspondence with J. Watson, S. Brazill re same (.2).
B150	10/16/24	E. Keil	0.50	Correspondence with Verita re solicitation packages, creditor communications (.3); correspondence with F. Lawall re same (.2).
B150	10/17/24	E. Keil	0.30	Conference with D. Simon re government claims (.3).
B150	10/22/24	J. Haake	1.10	Prepare for and participate in conference with T. Durham re questions about status of case (1.1).
B155	10/01/24	D. Northrop	0.30	Obtain transcript of 9.30.2024 hearing (.1); review same (.1); correspondence with MWE team re same (.1).
B155	10/02/24	N. Bull	1.00	Prepare for oral argument (1.0).
B155	10/03/24	J. Haake	0.40	Conference with D. Simon re preparations for hearing re contested matters (.4).
B155	10/03/24	N. Bull	2.00	Prepare for standing hearing (2.0).
B155	10/04/24	N. Bull	1.50	Prepare for hearing (1.5).
B155	10/07/24	E. Keil	2.30	Revise agenda, witness and exhibit lists (1.0); prepare for hearing (.9); conference with N. Bull, T. Cramton re hearing preparation (.4).
B155	10/07/24	D. Simon	2.50	Prepare for hearing (2.5).
B155	10/07/24	J. Bishop Jones	1.50	Communications with J. Haake re hearing (.2); review docket (.1); retrieve MFR and omnibus objection to same (.3); prepare hearing materials (.3); follow-up communications with Atlanta office services re same (.1); review transcript (.2); revise materials (.2); communications with office services re same (.1).
B155	10/07/24	N. Bull	11.00	Prepare for hearing, including review pleadings, caselaw and draft memorandum (8.5); conferences with D. Simon, T. Cramton, E. Keil, B. Jones, J. Decker and L. Halperin re hearing (2.5).
B155	10/08/24	J. Haake	3.80	Prepare for and participate in court hearing (3.8).
B155	10/08/24	C. Lee	1.90	Telephonically attend omnibus hearing (1.9).
B155	10/08/24	E. Keil	2.40	Prepare for and participate in omnibus hearing (2.1); correspondence with A. Marchant-Lessa re proposed orders (.3).
B155	10/08/24	D. Simon	4.20	Prepare for and participate in hearing (4.2).
B155	10/08/24	D. Northrop	0.30	Prepare transcript request for 10.8.2024 hearing (.2);



LaVie Care Centers, LLC

Client: 120098  
Invoice: 3973790  
Invoice Date: 12/31/24

Task	Date	Name	Hours	Description
B155	10/08/24	N. Bull	6.00	correspondence with transcriber re same (.1). Prepare for and participate in hearing (4.0); multiple conferences with MWE team and sponsor counsel re hearing (2.0).
B155	10/09/24	D. Northrop	0.80	Obtain transcript of 10.8.2024 hearing (.1); review same (.6); correspondence with MWE team re same (.1).
B155	10/14/24	E. Keil	0.10	Draft agenda for 10.22.2024 hearing (.1).
B155	10/21/24	D. Northrop	0.30	Review third notice of omnibus hearings (.1); file same (.2).
B155	10/21/24	D. Simon	1.20	Prepare notes for 10.22.2024 hearing (1.2).
B155	10/22/24	T. Cramton	0.20	Participate in remote status hearing (.2).
B155	10/22/24	D. Northrop	0.10	Communications with E. Keil re 10.22.2024 omnibus hearing and ordering transcript of same (.1).
B155	10/22/24	D. Simon	0.70	Prepare for hearing (.5); participate in same (.2).
B155	10/24/24	E. Keil	0.30	Draft agenda for 10.28.2024 hearing (.3).
B155	10/25/24	D. Northrop	0.30	Review Debtors' proposed agenda for 10.28.2024 hearing (.1); file same (.2).
B155	10/25/24	E. Keil	0.40	Revise 10.28.2024 agenda (.3); correspondence with D. Northrop re filing of same (.1).
B155	10/28/24	D. Simon	4.90	Prepare for and participate in Recovery Corp. hearing (4.4); follow-up conferences re same (.5).
B155	10/28/24	E. Keil	1.50	Prepare for and participate in Recovery Corp. hearing (1.5).
B155	10/28/24	D. Northrop	0.30	Prepare request for transcript of 10.28.2024 hearing on various Recovery Corp. motions (.2); correspondence with transcriber re same (.1).
B155	10/28/24	T. Cramton	2.30	Review filings and assist N. Bull with preparation for 10.28.2024 hearing (.7); participate in 10.28.2024 remote hearing, including conference and debriefing re same (1.6).
B155	10/30/24	D. Northrop	0.30	Obtain transcript of 10.28.2024 hearing on Recovery Corp. motions (.1); review same (.1); correspondence with MWE team re same (.1).
B160	10/01/24	D. Northrop	0.20	File OCP declaration by ALT Tax Group and Associates (.2).
B160	10/02/24	E. Keil	0.60	Draft MWE fee statement (.4); correspondence with M. Levin, M. Molitor re interim fee applications (.2).





LaVie Care Centers, LLC

Client: 120098  
Invoice: 3973790  
Invoice Date: 12/31/24

Task	Date	Name	Hours	Description
B160	10/03/24	D. Northrop	0.50	Review OCP declarations by Dzenitis Newman PLLC and Ragsdale Liggett PLLC (.1); file OCP declarations (.4).
B160	10/07/24	D. Northrop	0.60	File monthly staffing reports for June, July and August 2024 for Ankura Consulting Group, LLC (.6).
B160	10/09/24	D. Northrop	0.20	File OCP declaration for Seyfarth Shaw LLP (.2).
B160	10/14/24	E. Keil	0.40	Draft Ankura fee application (.4).
B160	10/24/24	D. Northrop	0.20	File Kiernan Trebach, LLP OCP declaration (.2).
B160	10/27/24	E. Keil	1.50	Review August time detail for privilege issues and compliance with Local Rules (1.5).
B160	10/31/24	E. Keil	1.00	Draft August fee statement (.8); correspondence with R. Ahmed re OCP summary (.2).
B185	10/14/24	E. Keil	0.40	Correspondence with J. Muenker, D. Dias, et al. re cure amounts and related objections (.4).
B185	10/15/24	E. Keil	3.80	Research re [REDACTED] (3.8).
B185	10/18/24	D. Simon	0.30	Conference with K. Furr re lease assumption matters (.3).
B185	10/24/24	C. Lee	1.40	Review and analyze lease (.3); research precedent re [REDACTED] (.5); correspond with E. Keil re same (.2); draft motion authorizing rejection of same (.4).
B185	10/28/24	C. Lee	1.00	Draft motion to reject lease (1.0).
B190	10/01/24	D. Northrop	0.10	Review order entered 10.1.2024 further extending the automatic stay and scheduling continued contingent hearing on 11.14.2024 in LaVie Care Centers, LLC et al. v. Healthcare Negligence Settlement Recovery Corp., Adv. Pro. No. 24-5127, and correspondence with MWE team re same (.1).
B190	10/01/24	D. Simon	1.60	Conferences re discovery and Recovery Corp matters (1.2); revise motion to vacate DIP objection (.4).
B190	10/02/24	D. Northrop	0.40	Review (i) OHI DIP Lender, LLC's opposition to Recovery Corp.'s motion to establish standing to challenge final DIP order, (ii) joinder of Midcap Funding IV Trust to Debtors and Omega Parties' objections to standing motion, (iii) joinder of TIX 33433 LLC to Debtors and Omega Parties' objections to standing motion, and (iv) notice of hearing on Recovery Corp.'s motion to dismiss or



LaVie Care Centers, LLC

Client: 120098  
Invoice: 3973790  
Invoice Date: 12/31/24

Task	Date	Name	Hours	Description
				convert Florida DivestCo reorganizations (.3); correspondence with MWE team re same (.1).
B190	10/02/24	D. Simon	0.80	Conferences and communications with N. Bull re Recovery Corp. pleadings and related discovery (.8).
B190	10/02/24	E. Keil	0.80	Conferences with N. Bull, T. Cramton, et al. re discovery issues (.8).
B190	10/03/24	C. Lee	0.20	Review and analyze response to motion to strike (.2).
B190	10/03/24	E. Keil	4.10	Conferences with T. Cramton, N. Bull, et al. re Recovery Corp. issues (.5); prepare discovery responses re same (.6); research re [REDACTED] (2.3); prepare summary re same (.7).
B190	10/03/24	D. Simon	3.90	Conferences re Recovery Corp. matters (.8); participate in meet and confer with Recovery Corp. (1.5); review Recovery Corp. pleadings and related materials (.6); analyze standing matters (1.0).
B190	10/04/24	E. Keil	3.00	Conference with T. Cramton, N. Bull, et al. re motion to strike reply (1.2); research re [REDACTED] (1.8).
B190	10/04/24	D. Simon	2.40	Conferences with N. Bull and DIP lenders re various discovery matters (1.0); conferences with litigation team re Recovery Corp. pleadings and response (1.4).
B190	10/05/24	D. Simon	1.00	Conferences and review of response re Recovery Corp. matters (1.0).
B190	10/06/24	D. Simon	1.00	Conferences with B. Jones and N. Bull re Recovery Corp. matters (.5); revise pleading (.5).
B190	10/07/24	D. Simon	2.70	Multiple conferences re Recovery Corp. matters (1.4); conferences with N. Bull and T. Cramton re same (1.3).
B190	10/08/24	E. Keil	3.70	Summarize Recovery Corp. reply (1.7); review affidavits provided by Recovery Corp. (1.3); revise proposed order re motion to strike (.5); correspondence with T. Cramton re same (.2).
B190	10/08/24	D. Simon	0.40	Conference with J. Muenker and L. Aiken re Recovery Corp. hearing (.4).
B190	10/09/24	E. Keil	0.70	Conference with L. Halperin, J. Decker, et al. re Recovery Corp. (.7).
B190	10/09/24	D. Simon	1.50	Conferences with J. Decker and L. Halperin re Recovery Corp. and confirmation matters (.8)



LaVie Care Centers, LLC

Client: 120098  
Invoice: 3973790  
Invoice Date: 12/31/24

Task	Date	Name	Hours	Description
				conferences with Synergy re same (.7).
B190	10/10/24	E. Keil	0.30	Revise order re motion to strike (.3).
B190	10/10/24	D. Simon	1.80	Conference with N. Bull and T. Cramton re discovery and litigation matters (.8); communications with Committee re insurance matters (.7); revise motion to strike order based on transcript (.3).
B190	10/10/24	D. Northrop	0.10	Upload proposed order granting in part Debtors' (i) motion to strike, and denying (ii) cross-motion to compel discovery responses (.1).
B190	10/11/24	E. Keil	0.40	Revise order re motion to strike (.4).
B190	10/11/24	D. Simon	1.00	Conference with J. Muenker and N. Bull re Brandon matters (.4); communications with N. Bull re Recovery Corp. matters (.6).
B190	10/12/24	D. Northrop	0.20	Review (i) order granting in part Debtors' motion to strike and denying cross-motion to compel discovery responses and (ii) order granting Recovery Corp.'s motion to redact (.1); correspondence with MWE team re same (.1).
B190	10/16/24	D. Northrop	0.40	Review (i) notice of appearance filed by Anthony & Partners, LLC, as counsel for 101 claimants and parties in interest, (ii) Florida claimants' motion to substitute party, and (iii) Florida claimants' and Recovery Corp.'s notice of filing of verified Rule 2019 disclosure statement (.3); correspondence with MWE team re same (.1).
B190	10/17/24	D. Simon	2.30	Review Recovery Corp. pleadings (.6); multiple conferences and communications re same (1.3); conference with Synergy re Brandon matters (.4).
B190	10/18/24	E. Keil	1.10	Conference with J. Muenker, B. Jones, et al. re government issues (.5); review motion for reconsideration, motion to substitute (.6).
B190	10/18/24	D. Simon	2.00	Review and conference re various Recovery Corp. matters (1.7); revise Brandon letter (.3).
B190	10/18/24	D. Northrop	0.20	Review Recovery Corp.'s motion for reconsideration and rehearing of strike order (.1); correspondence with MWE team re same (.1).
B190	10/20/24	E. Keil	0.60	Conference with N. Bull, T. Cramton re Recovery Corp. filings (.6).
B190	10/20/24	D. Simon	0.50	Conference re Recovery Corp. and litigation matters



**McDermott  
Will & Emery**

LaVie Care Centers, LLC

Client: 120098  
Invoice: 3973790  
Invoice Date: 12/31/24

Task	Date	Name	Hours	Description
				(.5).
B190	10/21/24	E. Keil	1.40	Meet and confer with Recovery Corp. (.5); conference with N. Bull, T. Cramton, et al. re same (.9).
B190	10/21/24	D. Simon	2.80	Multiple conferences and analysis re Recovery Corp. pleadings (1.8); participate in Recovery Corp. meet and confer (1.0).
B190	10/22/24	C. Lee	0.30	Review and analyze Recovery Corp. motion for reconsideration and rehearing of strike order and motion for relief from stay (.3).
B190	10/22/24	E. Keil	0.80	Conference with L. Halperin, J. Decker, et al. re Recovery Corp. (.5); conference with DOJ (.3).
B190	10/22/24	D. Simon	2.70	Numerous conferences and analysis re Recovery Corp. litigation, discovery and confirmation matters (2.7).
B190	10/23/24	D. Northrop	0.10	Review Recovery Corp.'s supplement to motion for reconsideration and rehearing of strike motion, and correspondence with MWE team re same (.1).
B190	10/23/24	D. Simon	2.50	Conferences and communications with litigation team re Recovery Corp. matters (1.1); conference with Recovery Corp. re open discovery and hearing matters (.8); conferences with DIP lenders re same (.6).
B190	10/24/24	E. Keil	3.00	Draft objection to Recovery Corp. stay relief request (2.2); conference with MidCap re contested workstreams (.4); correspondence with C. Lee re lease rejection motion (.2); correspondence with UCC re stay relief (.2).
B190	10/24/24	D. Simon	6.20	Numerous conferences with N. Bull, D. Dias, J. Muenker, et al. re open litigation and deposition matters (2.5); conferences with N. Bull and T. Cramton re discovery and Recovery Corp. matters (1.4); revise Recovery Corp. pleading (1.3); participate in meet and confer with Recovery Corp. (1.0).
B190	10/25/24	C. Lee	2.20	Research legal issues re [REDACTED] (1.6); summarize findings re same (.5); correspond with D. Simon, MWE team re same (.1).
B190	10/25/24	D. Northrop	0.50	Review Debtors' (i) omnibus objection to motion for reconsideration and rehearing, motion to allow



LaVie Care Centers, LLC

Client: 120098  
Invoice: 3973790  
Invoice Date: 12/31/24

Task	Date	Name	Hours	Description
				remote testimony, and motion for stay relief, and (ii) limited objection to motion to substitute party, and correspondence with E. Keil re revision to same (.1); file Debtors' (i) omnibus objection to motion for reconsideration and rehearing, motion to allow remote testimony, and motion for stay relief, and (ii) limited objection to motion to substitute party (.2); review (i) order denying motion to allow remote testimony at confirmation hearing and (ii) order and notice of hearing on Movants' motion to compel, motion to reconsider, motion to substitute and motion for relief (.1); correspondence with MWE team re same (.1).
B190	10/25/24	D. Simon	2.90	Revise Recovery Corp. pleadings (.8); conference with Aspire re discovery matters (.4); conferences with DIP lenders re Recovery Corp. matters and upcoming hearing (.7); conferences with N. Bull and T. Cramton re same (1.0).
B190	10/25/24	E. Keil	4.60	Revise omnibus objection to Recovery Corp. filings (3.4); conferences with D. Simon, N. Bull re same (.3); correspondence with D. Northrop re filing of same (.1); conference with V. Jones, et al. re IRS claims (.5); correspondence with R. Ahmed, B. Jones re same (.3).
B190	10/27/24	D. Simon	1.70	Conference with N. Bull re Recovery Corp. matters (.5); prepare for hearing re same (1.2).
B190	10/28/24	D. Simon	0.80	Conference re deposition and hearing preparation (.8).
B190	10/28/24	E. Keil	1.10	Conference with B. Jones, J. Decker, et al. re deposition preparation (1.1).
B190	10/28/24	D. Northrop	0.10	Review notice of hearing for Recovery Corp.'s motion for standing, and correspondence with MWE team re same (.1).
B190	10/29/24	D. Northrop	0.10	Review order entered 10.29.2024 denying Recovery Corp.'s request to reconsider strike order, and correspondence with MWE team re same (.1).
B190	10/29/24	E. Keil	2.50	Prepare for and participate in deposition preparation conference with B. Jones, J. Decker, et al. (1.8); correspondence with B. Jones, et al. re same (.2); conference with DOJ re plan issues (.3);



**McDermott  
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LaVie Care Centers, LLC

Client: 120098  
Invoice: 3973790  
Invoice Date: 12/31/24

Task	Date	Name	Hours	Description
				correspondence with L. Halperin, J. Decker, et al. re order denying reconsideration (.2).
B190	10/29/24	D. Simon	4.10	Participate in deposition preparation session (1.5); review documents in connection with same (.5); review confirmation declarations (.8); conferences with litigation team re expert witnesses and deposition matters (1.3).
B190	10/30/24	E. Keil	4.90	Conference with T. Cramton, N. Bull, et al. re expert depositions (.5); conference with B. Jones, J. Decker, et al. re deposition preparation (4.1); conference with T. Cramton, N. Bull, et al. re same (.3).
B190	10/30/24	D. Simon	5.60	Participate in deposition preparation sessions (4.0); multiple conferences with N. Bull and T. Cramton re deposition and discovery matters (1.6).
B190	10/31/24	E. Keil	2.80	Conference with B. Jones, J. Decker, et al. re deposition preparation (2.8).
B190	10/31/24	D. Simon	4.60	Participate in deposition preparation session (3.0); multiple conferences re deposition and discovery matters (1.6).
B195	10/01/24	E. Keil	1.80	Commute from ATL to ORD (travel time billed at 50%) (1.8).
B195	10/07/24	J. Haake	2.70	Travel from Dallas to Atlanta for contested hearing (travel time billed at 50%) (2.7).
B195	10/07/24	N. Bull	1.80	Travel from Miami to Atlanta for hearing (travel time billed at 50%) (1.8).
B195	10/08/24	J. Haake	2.30	Return travel from Atlanta to Dallas following court hearing (travel time billed at 50%) (2.3).
B195	10/08/24	N. Bull	2.00	Travel from Atlanta to Miami after hearing (travel time billed at 50%) (2.0).
B210	10/07/24	E. Keil	0.50	Conference with L. Halperin, J. Decker, et al. re status update (.5).
B210	10/11/24	E. Keil	0.50	Correspondence with S. Brazill re operational issues (.3); draft correspondence re same (.2).
B210	10/16/24	D. Northrop	0.20	Review first patient care ombudsman report filed by the State Long-Term Care Ombudsman for Virginia, and correspondence with MWE team re same (.2).
B210	10/22/24	D. Simon	0.50	Participate in update conference with client (.5).
B210	10/28/24	E. Keil	0.50	Conference with R. Ahmed re operational issues (.5).





LaVie Care Centers, LLC

Client: 120098  
Invoice: 3973790  
Invoice Date: 12/31/24

Task	Date	Name	Hours	Description
B210	10/31/24	E. Keil	1.50	Review and finalize September MORs (1.3); correspondence with D. Simon, D. Northrop, B. Jones re filing (.2).
B210	10/31/24	D. Northrop	0.70	File monthly operating reports for September 2024 for three separate Debtor groups (.6); review ombudsman report for the period 9.3.2024 through 10.31.2024 filed by the State of Pennsylvania Long-Term Care Ombudsman, and correspondence with MWE team re same (.1).
B230	10/01/24	C. Lee	0.10	Correspond with D. Simon, MWE team re objection to Recovery Corp. DIP standing motion (.1).
B230	10/02/24	C. Lee	0.70	Review and revise objection to DIP standing motion (.5); correspond with E. Keil, MWE team re same (.2).
B230	10/02/24	D. Northrop	0.30	Review Debtors' objection to Recovery Corp.'s motion to establish standing to challenge final DIP financing order and correspondence with C. Lee re revision to certificate of service for the objection (.1); file Debtors' objection to Recovery Corp.'s motion to establish standing to challenge final DIP financing order (.2).
B230	10/02/24	D. Simon	0.60	Further revisions to objection on DIP motion (.6).
B230	10/10/24	E. Keil	0.30	Compile and finalize DIP amendment (.3).
B230	10/10/24	D. Northrop	0.20	File notice of filing of first amendment to junior secured DIP credit and guaranty agreement (.2).
B240	10/02/24	G. Karch	0.70	Conference with J. Muenker, et al. re elections to treat LLCs as corporations for tax purposes (.7).
B280	10/10/24	J. Haake	0.40	Correspondence with E. Keil and S. Brazill re vendor issues (.4).
B280	10/17/24	J. Haake	0.30	Correspondence with F. Lawall re settlement conference with CFS (.3).
B280	10/21/24	J. Haake	1.10	Conferences and correspondence with B. Lynch, S. Brazill, and E. Keil re vendor issues (1.1).
B280	10/22/24	J. Haake	0.90	Conferences with vendors and A. Lojek and correspondence with S. Brazill re same (.9).
B280	10/24/24	J. Haake	0.60	Analysis of vendor issues and revise draft stipulated order with CFS (.5); correspondence with D. Simon re same (.1).
B280	10/25/24	J. Haake	1.50	Analysis of vendor issues and conferences with Med Stat re termination letter (.7); correspondence and





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LaVie Care Centers, LLC

Client: 120098  
Invoice: 3973790  
Invoice Date: 12/31/24

Task	Date	Name	Hours	Description
				conferences with S. Brazill re vendor issues (.4); conference with J. Watson re same (.4).
B280	10/28/24	J. Haake	0.70	Conference with representative of CCA financial and correspondence with S. Brazill re lessor issue (.7).
B290	10/10/24	J. Haake	0.40	Correspondence with G. Hayes re insurance (.4).
B290	10/14/24	J. Haake	1.20	Review insurance documents and correspondence with N. Brannick re same (1.2).
B290	10/16/24	J. Haake	1.30	Review insurance information and correspondence with R. Trickey and D. Simon re same (1.0); correspondence with T. Brink re insurance issues (.3).
B290	10/17/24	J. Haake	0.20	Correspondence with D. Simon re insurance issues (.2).
B290	10/22/24	J. Haake	1.40	Analysis of insurance issues (1.1); correspondence with A. Spisak, D. Simon, and E. Keil re same (.3).
B290	10/28/24	J. Haake	0.70	Prepare for and participate in conference with broker re insurance issues (.7).
B290	10/29/24	A. Spisak	2.00	Review additional insurance policies and related claims information in connection with plan confirmation (2.0).
B290	10/29/24	J. Haake	0.80	Prepare for and participate in conference with A. Spisak, D. Simon, and E. Keil re insurance issues (.8).
B290	10/29/24	E. Keil	0.90	Conference with J. Haake, A. Sispak, et al. re XL insurance (.4); review insurance policies re same (.5).
B290	10/30/24	A. Spisak	2.00	Review additional insurance policies and related claims information in connection with plan confirmation (2.0).
B290	10/30/24	J. Haake	1.70	Prepare for and participated in conference with Chubb re insurance issues (1.0); conference with T. Brink re XL insurance policy (.7).
B310	10/17/24	C. Lee	2.40	Research legal issues re [REDACTED] (2.0); summarize same (.3); correspond with E. Keil re same (.1).
B310	10/31/24	D. Northrop	2.20	Review joint motion for entry of stipulated order approving application of pre-petition deposit held by Corporate Fleet Services, Inc. and related stipulated order (.1); finalize same for filing (.1); review



LaVie Care Centers, LLC

Client: 120098  
Invoice: 3973790  
Invoice Date: 12/31/24

Task	Date	Name	Hours	Description
				possible filing events for the joint motion for entry of stipulated order (.3); correspondence with J. Haake re choice of ECF filing event (.1); file joint motion for entry of stipulated order (.2); draft notice of hearing and deadline to object to joint motion for entry of stipulated order (.7); review revised draft of notice of hearing and opportunity to object (.1); further revise notice (.1); finalize notice for filing (.1); file notice (.2); coordinate supplemental service of joint motion and notice of hearing and deadline to object by Verita Global (.2).
B320	10/01/24	D. Northrop	1.30	Upload revised proposed solicitation procedures/disclosure statement approval order (.1); upload further revised proposed solicitation procedures/disclosure statement approval order (reflecting additional revisions from the court) (.1); review solicitation procedures/disclosure statement approval order entered on 10.1.2024 and correspondence with MWE team re same (.1); review solicitation version of Debtors' second amended combined disclosure statement and joint chapter 11 plan of reorganization and communications with E. Keil re revision to same (.1); file solicitation version of Debtors' second amended combined disclosure statement and joint chapter 11 plan and notice of filing of redline version of second amended combined disclosure statement and plan (.5); review notice of combined hearing set for 11.14.2024 and communications with E. Keil re correct ECF filing event to use for the notice of combined hearing (.1); file notice of combined hearing (.2); communications with E. Keil re possible request from the clerk's office to re-file the notice of combined hearing (.1).
B320	10/01/24	E. Keil	5.30	Conference with L. Halperin, J. Decker, et al. re plan (.6); revise solicitation procedures order per court comments (1.4); revise ballots, notices, et al. re same (2.3); finalize plan for filing (.6); revise combined hearing notice (.4).
B320	10/01/24	D. Simon	0.50	Conference with client re revisions to plan (.5).



LaVie Care Centers, LLC

Client: 120098  
Invoice: 3973790  
Invoice Date: 12/31/24

Task	Date	Name	Hours	Description
B320	10/02/24	D. Northrop	0.70	Review disclosure statement approval order (.3); communications with MWE team re dates and deadlines established by the disclosure statement approval order (.4).
B320	10/02/24	D. Simon	1.10	Conference re tax matters for plan (.5); conference with J. Muenker re plan matters (.6).
B320	10/02/24	E. Keil	2.50	Correspondence with KCC, R. Ahmed re solicitation materials (.4); conferences with same re same (1.1); review solicitation service plan (.3); correspondence with C. Lee re confirmation research (.2); conferences with D. Simon re same (.5).
B320	10/03/24	C. Lee	1.10	Research legal issues re plan confirmation (1.1).
B320	10/03/24	D. Simon	0.40	Conferences re voting and solicitation matters (.4).
B320	10/04/24	D. Simon	0.40	Conference with Proskauer re Midcap plan matters (.4).
B320	10/07/24	C. Lee	1.40	Research legal issues re plan confirmation (1.4).
B320	10/08/24	E. Keil	0.70	Draft declaration in support of confirmation (.7).
B320	10/09/24	C. Lee	2.40	Research legal issues re plan confirmation (2.0); summarize findings re same (.4).
B320	10/09/24	J. Haake	0.70	Prepare for and participate in conference with T. Brink re insurance and plan issues (.6); correspondence with D. Simon re same (.1).
B320	10/09/24	E. Keil	1.20	Draft Decker declaration (.8); review plan inquiry re XL insurance and analyze same (.4).
B320	10/09/24	D. Simon	0.50	Conference with J. Muenker re plan issues (.5).
B320	10/10/24	E. Keil	0.40	Revise Decker declaration in support of confirmation (.4).
B320	10/10/24	D. Simon	0.70	Communications with E. Keil re confirmation prep (.7).
B320	10/11/24	J. Haake	1.90	Correspondence with L. Frances and E. Keil re insurance issues related to plan process (1.2); review unliquidated claims procedures (.7).
B320	10/11/24	C. Lee	2.80	Research legal issues re plan confirmation (2.3); summarize findings re same (.3); correspond with E. Keil, MWE team re same (.2).
B320	10/12/24	J. Haake	0.20	Correspondence with E. Keil re unliquidated claim procedures (.2).
B320	10/13/24	E. Keil	0.50	Review plan supplement documents (.5).
B320	10/13/24	J. Haake	0.70	Review GUC Trust Agreement and correspondence with E. Keil re same (.7).



LaVie Care Centers, LLC

Client: 120098  
Invoice: 3973790  
Invoice Date: 12/31/24

Task	Date	Name	Hours	Description
B320	10/14/24	J. Haake	1.10	Draft declaration of M. Krakovsky in support of confirmation (1.1).
B320	10/14/24	E. Keil	1.80	Draft notice of plan supplement (.6); draft Jones declaration in support of confirmation (1.2).
B320	10/14/24	D. Simon	1.80	Multiple conferences and communications re plan and cure matters (1.2); conference with Committee re insurance and plan related matters (.6).
B320	10/15/24	J. Haake	0.90	Conference with M. Krakovsky re draft declaration in support of plan (.3); revise draft declaration of M. Krakovsky in support of confirmation and correspondence with E. Keil re same (.6).
B320	10/15/24	D. Northrop	1.20	Review seventeen (17) attorney affidavits filed in support of Recovery Corp.'s confirmation objections (1.0); correspondence with MWE team re same (.2).
B320	10/15/24	E. Keil	2.30	Draft declarations in support of confirmation (2.3).
B320	10/15/24	D. Simon	1.30	Conferences with Synergy re open plan issues (.6); conference with P. Martin re plan voting (.2); conference with B. Jones re plan and confirmation matters (.5).
B320	10/16/24	C. Lee	0.20	Correspond with E. Keil re comments to plan (.1); correspond with Chubb counsel re same (.1).
B320	10/16/24	E. Keil	2.10	Revise Decker declaration in support of confirmation (.9); revise Jones declaration re same (1.2).
B320	10/16/24	D. Simon	1.00	Communications with E. Keil, et al. re plan related matters (1.0).
B320	10/17/24	E. Keil	7.00	Correspondence with Verita re solicitation (.4); revise Jones declaration (1.9); draft voting declaration (1.2); draft confirmation brief (2.3); revise Decker declaration (.9); correspondence with UCC re GUC Trust Agreement (.3).
B320	10/17/24	D. Simon	1.60	Multiple conferences and communications re various plan and plan supplement issues (1.6).
B320	10/18/24	C. Lee	1.20	Conference with Chubb counsel re plan comments (.5); conference with E. Keil re same (.3); review and analyze same (.2); correspond with J. Haake re same (.2).
B320	10/18/24	E. Keil	1.50	Review plan comments (.2); conference with C. Lee re same (.3); correspondence with D. Simon re same (.2); revise plan exclusivity order (.5);



LaVie Care Centers, LLC

Client: 120098  
Invoice: 3973790  
Invoice Date: 12/31/24

Task	Date	Name	Hours	Description
				correspondence with chambers re same (.2); correspondence with Verita re solicitation (.1).
B320	10/18/24	D. Simon	1.30	Conference with plan sponsor re government claims (.6); conferences re Powerback claim waiver (.7).
B320	10/18/24	D. Northrop	0.30	Upload proposed order extending Debtors' exclusive periods to file a chapter 11 plan and solicit acceptances thereof (.1); review correspondence from the clerk of the Bankruptcy Court re deficient order uploaded and follow-up correspondence with E. Keil re same (.1); upload revised proposed order extending Debtors' exclusive periods to file a chapter 11 plan and solicit acceptances thereof (.1).
B320	10/21/24	J. Haake	1.80	Prepare for and participate in conference with D. Kovsky-Apap re plan issues (1.5); follow up conference with D. Simon re same (.3).
B320	10/21/24	C. Lee	0.20	Summarize plan comments and correspond with E. Keil re same (.2).
B320	10/21/24	E. Keil	5.10	Draft confirmation brief (2.3); revise declarations in support of confirmation (1.4); conference and correspondence with creditors re ballots, solicitation materials (.3); draft confirmation order (1.1).
B320	10/21/24	D. Northrop	0.30	Review notice of filing of form of GUC Trust Agreement (.1); file same (.2).
B320	10/21/24	D. Simon	2.00	Correspondence with J. Haake and D. Kovsky re GUC Trust and other plan supplement matters (.8); conference re confirmation preparation and related matters (1.2).
B320	10/22/24	E. Keil	5.30	Draft confirmation declarations, confirmation order, confirmation brief (5.1); correspondence with Verita, creditors re solicitation materials (.2).
B320	10/22/24	D. Simon	1.30	Conference with DOJ re plan matters (.5); conferences with E. Keil, et al. re plan and confirmation preparations (.8).
B320	10/23/24	J. Haake	0.90	Review Committee revisions to unliquidated claims procedures (.7); correspondence with D. Simon re same (.2).
B320	10/23/24	E. Keil	3.50	Revise confirmation order (2.2); revise Jones declaration in support of confirmation (1.3).
B320	10/24/24	E. Keil	4.60	Conference with D. Simon re confirmation workstreams (.5); revise confirmation order (3.2);



LaVie Care Centers, LLC

Client: 120098  
Invoice: 3973790  
Invoice Date: 12/31/24

Task	Date	Name	Hours	Description
B320	10/25/24	D. Simon	1.50	revise Krakovsky declaration (.9); Conferences with IRS re confirmation matters (.7); conference with G. Hayes re same (.2); conferences with E. Keil re same (.6).
B320	10/25/24	E. Keil	2.80	Review plan supplement documents (1.8); conferences with D. Simon, J. Muenker re same (.5); correspondence with S. Reitzel re service of same (.2); correspondence with Chubb re plan comments (.3).
B320	10/27/24	E. Keil	1.30	Revise Krakovsky declaration (.6); revise Decker declaration (.7).
B320	10/28/24	J. Haake	0.60	Review comments to unliquidated claim procedures and correspondence with D. Simon re same (.6).
B320	10/28/24	D. Simon	2.50	Conference with Powerback re plan issues (.4); conference with Synergy re same (.3); conference with various objecting parties re plan issues (.5); numerous conferences and review of plan supplement documents (1.3).
B320	10/28/24	E. Keil	6.30	Review and revise plan supplement documents (4.0); conference with D. Simon re same (.2); revise B. Jones declaration in support of confirmation (2.1).
B320	10/28/24	D. Northrop	0.30	Review notice of filing of plan supplement and exhibits thereto (.1); file same (.2).
B320	10/29/24	E. Keil	3.30	Revise plan supplement documents, including revised executory contract schedule (1.9); conference with D. Simon re same (.2); correspondence with various contract counterparties re same (.7); conference with D. Kovsky, F. Lawall, et al. re UCC declaration in support of confirmation (.5).
B320	10/29/24	D. Simon	1.60	Conference with DOJ re plan issues (.6); conference with Committee re confirmation support (.6); conference with J. Haake re plan insurance matters (.4).
B320	10/30/24	C. Lee	0.60	Participate in video conference with E. Keil, MWE team, and Chubb re comments to plan (.5); prepare for same (.1).
B320	10/30/24	E. Keil	2.00	Conference with Chubb re plan comments (.5); conference with J. Haake re same (.4); revise





LaVie Care Centers, LLC

Client: 120098  
Invoice: 3973790  
Invoice Date: 12/31/24

Task	Date	Name	Hours	Description
B320	10/30/24	D. Simon	2.80	assumed contracts list (.5); correspondence with contract counterparties re same (.4); correspondence with KCC re solicitation and voting (.2). Conferences with various objecting parties (Chubb, Midcap, etc.) re plan confirmation issues (1.4); review plan confirmation matters (.7); conference with J. Anthony re settlement matters (.7).
B320	10/31/24	C. Lee	0.40	Conferences with claimants re plan, voting (.4).
B320	10/31/24	E. Keil	2.00	Revise assumed contracts list (.7); conference with J. Watson re same (.5); correspondence with G. Hayes, J. Watson, et al. re cure amounts for same (.8).
B320	10/31/24	D. Simon	2.90	Conferences with various objecting parties re objections and resolutions (1.4); settlement conference with Recovery Corp. (.8); review confirmation pleadings (.7).
B470	10/01/24	H. Putre	1.20	Conference with N. Bull re [REDACTED] [REDACTED] (.3); conduct legal research re same (.9).
B470	10/01/24	T. Cramton	1.70	Correspondence with MWE team and Recovery Corp. counsel to schedule meet-and-confer (.3); scheduling-related emails re upcoming hearings (.2); review transcript of 9.30.2024 hearing (.5); legal and strategic analysis on [REDACTED] [REDACTED] including correspondence and conference with N. Bull re same (.7).
B470	10/01/24	A. Chatham	0.80	Revise and send correspondence to plaintiffs' counsel in Brandon litigation re violations of automatic stay (.8).
B470	10/01/24	N. Bull	2.50	Multiple conferences and correspondence with MWE team re legal research and strategy (2.0); finalize letter to Brandon plaintiffs (.5).
B470	10/02/24	H. Putre	4.20	Legal research and analysis re [REDACTED] [REDACTED] and report findings re same (3.1); research and analysis re [REDACTED] [REDACTED] (1.1).
B470	10/02/24	T. Cramton	2.30	Review updated pre-filing draft objection to Recovery Corp. motion to vacate (.5); conferences





LaVie Care Centers, LLC

Client: 120098  
Invoice: 3973790  
Invoice Date: 12/31/24

Task	Date	Name	Hours	Description
				with N. Bull on standing issue and upcoming hearing (.5); conferences and correspondence with N. Bull and D. Simon on discovery-related issues and upcoming meet-and-confer with Recovery Corp. (.5); review and consider standing-related argument, including follow-up correspondence with N. Bull re same (.3); correspondence and conference re substitution issue and other strategic considerations for motion to strike and next steps (.5).
B470	10/02/24	N. Bull	1.50	Prepare for meet and confer with Recovery Corp. counsel (.5); conferences with MWE team re discovery, motion to strike and strategy (1.0).
B470	10/03/24	T. Cramton	9.60	Review filed objection to Recovery Corp. vacate motion (.5); correspondence with Recovery Corp. counsel re upcoming meet-and-confer (.1); review and analyze standing and assignment-related arguments, including correspondence, conference, and pulling settlement agreements and related court filings re same (1.5); correspondence with N. Bull and H. Putre requesting additional legal research to vet arguments (.3); review and analyze Recovery Corp. correspondence re discovery (.5); conference with D. Simon and E. Keil re Recovery Corp. correspondence and upcoming meet-and-confer (.2); prepare for upcoming meet-and confer (.5); conference with D. Simon, N. Bull, and E. Keil on upcoming meet-and-confer (.5); participate in meet-and-confer conference with Recovery Corp. counsel (2.0); review notes and send email with takeaways from meet-and-confer (.5); review and analyze Recovery Corp. opposition to motion to strike, including conference with N. Bull re same (1.7); prepare demonstrative exhibit for 10.8.2024 hearing with excerpts from assignments and Florida statute (.8); begin drafting reply to Recovery Corp. opposition (.5).
B470	10/03/24	H. Putre	1.00	Research and analysis re Recovery Corp. (1.0).
B470	10/03/24	N. Bull	3.50	Prepare for and meet and confer with Recovery Corp. (2.0); multiple conferences with MWE team (1.0); review legal research (.5).



LaVie Care Centers, LLC

Client: 120098  
Invoice: 3973790  
Invoice Date: 12/31/24

Task	Date	Name	Hours	Description
B470	10/04/24	H. Putre	4.00	Research, analyze, and report findings re [REDACTED] [REDACTED] (4.0).
B470	10/04/24	T. Cramton	9.10	Complete initial draft reply to Recovery Corp. opposition to motion to strike/compel (7.8); conferences and correspondence with N. Bull, D. Simon, and E. Keil re same (.4); review and respond to Recovery Corp. correspondence re discovery meet-and-confer (.3); correspondence re discovery, upcoming hearing on motion to strike, and other litigation-related items (.3); additional edits on proposed demonstrative exhibit for standing motion hearing (.3).
B470	10/04/24	N. Bull	7.50	Review Recovery Corp. filing and exhibits (1.5); multiple conferences with MWE team re motion to strike, discovery and strategy (2.0); conference with sponsor's counsel (.5); revise draft response (3.5).
B470	10/05/24	T. Cramton	4.20	Correspondence with team on facility-by-facility P&L statements (.3); prepare and send correspondence to MWE e-discovery re additional searches per meet-and-confer with Recovery Corp. to facilitate document productions (.7); conference with N. Bull re upcoming hearing on standing motion, including potential cross-exam and exhibits (.5); additional revisions and updates on demonstrative exhibit for hearing (.3); additional revisions and updates on reply to Recovery Corp. opposition to motion to strike, then send to N. Bull with comments (2.4).
B470	10/05/24	N. Bull	4.00	Revise draft reply memorandum (4.0).
B470	10/06/24	M. Khurana	1.60	Conduct case law research re [REDACTED] [REDACTED] (1.6).
B470	10/06/24	N. Bull	4.00	Revise draft reply memorandum and review legal research (2.5); conferences with MWE team re brief and strategy (1.5).
B470	10/07/24	T. Cramton	8.10	Comment and review updated reply to motion to strike, including related correspondence with MWE team re same (.5); correspondence with N. Bull on motion to strike hearing preparation, then prepare outline with potential questions from court on oral



LaVie Care Centers, LLC

Client: 120098  
Invoice: 3973790  
Invoice Date: 12/31/24

Task	Date	Name	Hours	Description
				argument for same, including related legal research and send to N. Bull with comments (4.0); review and analyze search term hit reports for Recovery Corp document requests per meet-and-confer, including correspondence with MWE e-discovery re same (1.0); legal research on [REDACTED] (1.0); conference with N. Bull and E. Keil re demonstrative exhibit and hearing prep questions, including follow-up edits re same (1.2); correspondence with MWE team and opposing counsel on upcoming hearing, exhibits, and witness lists (.4).
B470	10/07/24	D. Valentino	0.80	Process data, resolve technical issues and promote documents for attorney review (.2); conduct final QC ensuring natives, text and metadata present (.4); update search index and search term reports (.2).
B470	10/07/24	E. Kwon	1.60	Identify additional potentially relevant documents (1.1); prepare reports of same (.5).
B470	10/08/24	T. Cramton	4.50	Correspondence with MWE team and opposing counsel on motion to strike hearing prep, exhibits, and discovery (.6); preliminary review and analysis of Recovery Corp. response to opposition to motion to vacate, including E. Keil notes re same (.4); participate in hearing on motion to strike (2.2); follow-up conference with N. Bull on hearing and next steps (.4); review draft proposed order, including conference with E. Keil re same (.4); correspondence with E. Kwon (e-discovery) re search terms and P&L production (.2); correspondence with MWE team re discovery and other considerations post-ruling (.3).
B470	10/08/24	N. Bull	0.50	Review Recovery Corp. filings (.5).
B470	10/09/24	T. Cramton	3.20	Conference with Chapman, client, and MWE teams re next steps following motion to strike hearing (.8); review and analyze hearing transcript, including related correspondence with team on proposed order for same (1.1); follow-up on document discovery and STR searches (.3); review Recovery Corp. declarations and related filings (1.0).
B470	10/09/24	A. Chatham	0.50	Review correspondence from Brandon plaintiffs'



LaVie Care Centers, LLC

Client: 120098  
Invoice: 3973790  
Invoice Date: 12/31/24

Task	Date	Name	Hours	Description
				counsel (.2); analyze confidentiality stipulation in prior litigation (.2); correspondence to D. Simon and N. Bull re same (.1).
B470	10/09/24	N. Bull	3.50	Multiple conferences with MWE team, client and sponsor re hearing, discovery, strategy and Brandon litigation (2.5); review transcript and Brandon correspondence (1.0).
B470	10/10/24	B. Casten	1.80	Coordinate the transfer, tracking, processing, and loading of client documents into the repository for review and production (.8); customize the file transfer portal to add additional recipients to receive new productions (.5); coordinate the preparation of file transfer portal and post production LV006 for transfer to receiving parties (.5).
B470	10/10/24	T. Cramton	2.10	Correspondence with Recovery Corp. counsel re discovery, including conference with MWE team re same (.4); conference with N. Bull and D. Simon re next steps and discovery following motion to strike (.7); coordinate production of P&Ls, including revising and finalizing cover letter and emails, and conference with MWE e-discovery and N. Bull re same (.4); comment and review of proposed order on motion to strike, including conference re same (.4); review as-filed version of same (.2).
B470	10/10/24	N. Bull	2.40	Conferences with MWE team re discovery and strategy (1.0); review transcript and revise draft order (1.0); correspondence with Recovery Corp.'s counsel re discovery (.4).
B470	10/11/24	T. Cramton	1.90	Correspondence and conference with MWE team re comments and suggested revisions on proposed order on motion to strike and cross-motion to compel (.9); draft and send proposed edits re same (.3); follow-up review and analysis of search term reports to prepare for document discovery (.7).
B470	10/11/24	N. Bull	1.50	Conferences with D. Simon, T. Cramton and sponsor counsel re strategy and Brandon litigation (1.0); revise draft order (.5).
B470	10/15/24	T. Cramton	0.50	Review Recovery Corp. filings and compare with affidavits from motion to strike (.3); correspondence and conference with MWE team re same (.2).



LaVie Care Centers, LLC

Client: 120098  
Invoice: 3973790  
Invoice Date: 12/31/24

Task	Date	Name	Hours	Description
B470	10/16/24	T. Cramton	0.90	Review Florida claimants' motion to substitute and related filings, including correspondence with MWE team re same (.5); review Recovery Corp. affidavits, including correspondence and conference re same with MWE team (.2); prepare and send correspondence with document discovery plan to team (.2).
B470	10/16/24	N. Bull	1.50	Review Recovery Corp. filings (1.0); conferences with MWE team re strategy (.5).
B470	10/17/24	T. Cramton	1.30	Review and analyze Florida claimants' motion to substitute (.4); conferences with D. Simon, N. Bull, and counsel for Omega/Synergy on potential opposition to motion to substitute and related issues (.5); review prior research and analysis on [REDACTED], and circulate same to team with comments (.4).
B470	10/17/24	N. Bull	4.50	Multiple conferences with MWE team and sponsor counsel re strategy and Brandon litigation (2.5); review Recovery Corp. filings (1.0); draft correspondence (1.0).
B470	10/18/24	T. Cramton	1.90	Correspondence with MWE e-discovery to coordinate upcoming document production (.4); review and analyze Recovery Corp. motion for reconsideration and related affidavits (1.1); correspondence and conference with MWE team re same (.4).
B470	10/18/24	N. Bull	2.00	Review Recovery Corp. filings (1.5); correspondence with MWE team and sponsor counsel re strategy (.5).
B470	10/20/24	T. Cramton	2.50	Conference with D. Simon, N. Bull, and E. Keil re next steps and potential response/opposition to motion for reconsideration and motion to substitute (.6); follow-up correspondence and conference re same, including scheduling meet-and-confer with opposing counsel (.5); legal research to [REDACTED] (1.0); prepare and send write-up with findings and analysis re same (.4).
B470	10/21/24	T. Cramton	3.50	Conference with D. Simon and N. Bull re case strategy re reconsideration motion and motion to





LaVie Care Centers, LLC

Client: 120098  
Invoice: 3973790  
Invoice Date: 12/31/24

Task	Date	Name	Hours	Description
				substitute, discovery, and other Recovery Corp-related issues (1.0); legal research on [REDACTED], then prepare and send write-up re same to D. Simon (.5); review motions to substitute and reconsideration motion, plus Recovery Corp. affidavits ahead of meet-and-confer, including conference with MWE team re same (.5); participate in meet-and-confer with J. Anthony, including follow-up debrief with MWE team (1.5).
B470	10/21/24	E. Kwon	0.70	Identify document for production and prepare same for production (.7).
B470	10/21/24	N. Bull	3.00	Multiple conferences with MWE team and Recovery Corp. (2.5); review filings (.5).
B470	10/22/24	E. Kwon	0.80	Produce documents for production (.8).
B470	10/22/24	N. Bull	3.70	Multiple conferences with MWE team re hearing, discovery and strategy (2.5); review Recovery Corp. filings (.7); correspondence with MWE team and Recovery Corp. re discovery (.5).
B470	10/22/24	T. Cramton	7.50	Review deposition notices from Florida claimants/Recovery Corp. (.5); conferences with D. Simon and N. Bull re deposition notices, document discovery, and strategic considerations for Recovery Corp. motions for reconsideration and substitution (1.5); begin drafting omnibus objection to (a) motion for reconsideration, (b) motion to substitute, and (c) request for remote testimony, including conference with N. Bull and D. Simon, and related legal research (4.5); correspondence with MWE e-discovery re upcoming production, including conferences with D. Simon and N. Bull re same (.6); correspondence with opposing counsel re discovery-related issues and meet and confer (.4).
B470	10/23/24	T. Cramton	6.60	Correspondence with N. Bull re response to opposing counsel on requested meet and confer (.4); prepare and send draft response, then revise per N. Bull comments (.3); finalize and send response to opposing counsel (.3); coordinate production, prepare cover letter, and serve to opposing counsel (1.0); conference with D. Simon, E. Keil, and N. Bull re scheduling, hearing and response to court



LaVie Care Centers, LLC

Client: 120098  
Invoice: 3973790  
Invoice Date: 12/31/24

Task	Date	Name	Hours	Description
				inquiries, and strategic considerations and arguments (1.0); complete initial draft omnibus objection and circulate to MWE team with comments (3.6).
B470	10/23/24	E. Kwon	1.10	Update document set for production and produce same (1.1).
B470	10/23/24	N. Bull	5.00	Review pleadings (1.5); multiple conferences with MWE team and Recovery Corp. re discovery and next steps (2.5); correspondence with MWE team and opposing counsel (1.0).
B470	10/24/24	T. Cramton	5.70	Conferences with N. Bull and D. Simon re depositions and other discovery-related issues, omnibus objection, Monday hearing, and overall strategy (2.0); correspondence with opposing counsel re discovery-related issues and request for meet-and-confer (1.0); conference with MWE team re upcoming meet-and-confer, plus omnibus objection (.5); participate in meet-and-confer with opposing counsel, including follow-up items on search term hits and proposed modifications (1.5); revise, update and re-circulate omnibus objection to MWE team (.7).
B470	10/24/24	N. Bull	8.50	Multiple conferences with MWE team, Synergy and Recovery Corp. re discovery (3.5); revise objection to motions to reconsider and substitute (4.5); attention to discovery (.5).
B470	10/25/24	N. Bull	3.30	Revise objection (1.0); multiple conferences with MWE team re strategy (1.0); correspondence with Recovery Corp. (.5); review legal research (.4); review opinion (.4).
B470	10/26/24	T. Cramton	1.30	Review and analyze search term report (STR) with proposed modifications for Recovery Corp. (.5); conference with N. Bull re same and other litigation and discovery matters, including document review and deposition scheduling and logistics (.4); review recent docket updates and court orders (.4).
B470	10/26/24	N. Bull	0.40	Conference with T. Cramton re discovery (.4).
B470	10/27/24	T. Cramton	0.50	Correspondence with client and conference with MWE team re depositions and upcoming hearing (.5).
B470	10/27/24	N. Bull	1.50	Multiple conferences and correspondence with





LaVie Care Centers, LLC

Client: 120098  
Invoice: 3973790  
Invoice Date: 12/31/24

Task	Date	Name	Hours	Description
B470	10/28/24	T. Cramton	5.80	MWE team re discovery and hearing (1.5). Evaluate terms and STRs and coordinate with MWE e-discovery team re modified search terms (.9); correspondence with opposing counsel and conference with MWE team re same (.7); draft supplemental rogs and circulate internally with comments (1.5); prepare preliminary deposition and hearing schedule, and send to client after revisions, per D. Simon request and email communications (.5); correspondence with Review team on upcoming document review, including preliminary review of documents with discussion on responsiveness and privilege tagging (1.7); conference with MWE team and client on deposition scheduling and related matters (.5).
B470	10/28/24	H. Putre	3.10	Conference with MWE team re impending document review (.1); search for and obtain case precedent re deposition of trial lawyer (.2); review, analyze, and code documents re discovery requests (2.6); conference with M. Khurana and T. Cramton re same (.2).
B470	10/28/24	M. Khurana	2.20	Review documents for privilege and responsiveness issues (2.2).
B470	10/28/24	D. Valentino	1.00	Promote saved search for attorney review (.3); conduct final QC ensuring natives, text and metadata present (.5); update search index and search term reports (.2).
B470	10/28/24	E. Kwon	0.70	Coordinate preparing additional potentially relevant documents for case development review in the discovery document repository (.5); create sets of same for organized review (.2).
B470	10/28/24	N. Bull	5.00	Prepare for and participate in hearing (3.0); multiple conferences with clients and MWE team re deposition preparation (1.0); correspondence with Recovery Corp. and attention to discovery issues (1.0).
B470	10/29/24	T. Cramton	7.50	Review details of prior productions, then prepare and send list of final instructions to MWE e-discovery team for "clean-up" productions by 11.1.2024 and priv log considerations (1.3);



LaVie Care Centers, LLC

Client: 120098  
Invoice: 3973790  
Invoice Date: 12/31/24

Task	Date	Name	Hours	Description
				participate in MWE deposition preparation conference (1.7); review court order denying motion to reconsider, including emails and conference with MWE team and client (.6); correspondence and conference with E. Kwon, M. Khurana, and H. Putre re document review and redactions (.5); coordinate document productions to UCC, including drafting cover letter (.4); review and analyze E. Kwon's responses on remaining document discovery for final/clean-up productions (.7); complete document review and coding for priv/responsiveness on J. Walker emails (approx. 500 docs) (1.5); conference with N. Bull re document discovery/productions, depositions/deposition preparation, and expert issues (.8).
B470	10/29/24	H. Putre	3.30	Review, analyze, and code documents in review queue (2.9); conference with M. Khurana re same (.2); review correspondence re same (.2).
B470	10/29/24	M. Khurana	4.40	Review documents for privilege and responsiveness issues (2.2); redact documents for privilege (2.2).
B470	10/29/24	E. Kwon	2.80	Provide recent LV productions to Committee non-party recipients (.8); assist with redacting documents for upcoming production (.5); isolate various sets of documents for quality assurance review in preparing for production (.8); identify any and all remaining documents for production (.7).
B470	10/29/24	N. Bull	4.50	Multiple conferences re deposition preparation and strategy (2.5); review legal research (.5); review pleadings and other materials (1.5).
B470	10/30/24	H. Putre	2.10	Apply redactions to privilege documents in review set (1.8); conference with MWE team re same, coding and production (.3).
B470	10/30/24	T. Cramton	8.90	Correspondence with MWE team scheduling conference re expert issues and re-circulating draft supplemental rog responses (.3); legal research on [REDACTED] (.5); conference re experts and related issues (.5); participate in deposition preparation with client (4.5); conference re depositions, experts, and



LaVie Care Centers, LLC

Client: 120098  
Invoice: 3973790  
Invoice Date: 12/31/24

Task	Date	Name	Hours	Description
				discovery (.4); draft, circulate and revise response to opposing counsel request for valuation docs, including conferences and emails re same (.9); coordinate production of Opco SNF valuations, including drafting and serving cover letter (.6); legal research on [REDACTED] (.6); follow-up/supervise matters re final document production (.6).
B470	10/30/24	C. Gelat	0.50	Perform targeted search and follow-up with case team and technology project manager re upcoming document production (.5).
B470	10/30/24	E. Kwon	3.60	Isolate sets of documents for quality assurance review (1.5); assist with redacting documents (.9); prepare valuation documents for production (.7); isolate documents for production (.5).
B470	10/30/24	M. Khurana	3.10	Redact documents for production (3.1).
B470	10/30/24	N. Bull	5.30	Multiple conferences re deposition preparation (4.5); revise discovery responses (.8).
B470	10/31/24	C. Gelat	0.30	Update document production tracker (.3).
B470	10/31/24	M. Khurana	0.10	Review documents for production (.1).
B470	10/31/24	T. Cramton	7.00	Review N. Bull comments and revise/update supplemental interrogatory responses (1.0); circulate to MWE and client teams (.1); correspondence and conference with MWE e-discovery team to finalize final productions (.6); participate in deposition preparation conference and related follow-up (3.5); participate in MWE team conferences re discovery, depositions, and potential expert (.7); participate in meet-and-confer conference, plus follow-up re same (1.1).
B470	10/31/24	S. Bride	2.00	Research cases re [REDACTED] (2.0).
B470	10/31/24	E. Kwon	3.30	Isolate sets of documents for production (1.5); review same for quality assurance (.8); prepare same for production (1.0).
B470	10/31/24	N. Bull	4.50	Multiple conferences re deposition preparation and discovery (4.5).
<b>Total Hours</b>			<b>596.60</b>	



LaVie Care Centers, LLC

Client: 120098  
Invoice: 3973790  
Invoice Date: 12/31/24

### Timekeeper Summary

Name	Hours	Rate	Amount
J. Bishop Jones	1.50	360.00	540.00
S. Bride	2.00	385.00	770.00
N. Bull	108.90	1,650.00	179,685.00
B. Casten	1.80	690.00	1,242.00
A. Chatham	1.30	1,525.00	1,982.50
T. Cramton	110.60	1,290.00	142,674.00
C. Gelat	0.80	590.00	472.00
J. Haake	44.40	1,335.00	59,274.00
G. Karch	0.70	2,210.00	1,547.00
E. Keil	119.70	1,245.00	149,026.50
M. Khurana	11.40	805.00	9,177.00
E. Kwon	14.60	570.00	8,322.00
C. Lee	26.20	1,155.00	30,261.00
D. Northrop	17.20	745.00	12,814.00
H. Putre	18.90	925.00	17,482.50
D. Simon	100.80	1,650.00	166,320.00
A. Spisak	8.90	1,245.00	11,080.50
R. Trickey	5.10	925.00	4,717.50
D. Valentino	1.80	280.00	504.00
<b>Totals</b>	<b>596.60</b>		<b>\$797,891.50</b>

### Task Code Summary

Task Code	Description	Hours	Amount
B130	Asset Disposition	0.20	149.00
B140	Relief from Stay/Adequate Protection Proceedings	34.40	42,001.50
B150	Mtgs/Communications w/Creditor	2.80	3,585.00
B155	Court Hearings	54.80	80,043.00
B160	Fee/Employment Applications	5.20	5,624.00
B185	Assumption/Rejection of Leases	6.90	8,496.00
B190	Other Contested Matters	97.50	143,048.50
B195	Non-Working Travel	10.60	15,186.00
B210	Business Operations	4.40	5,230.50
B230	Financing/Cash Collections	2.20	2,660.00
B240	Tax Issues	0.70	1,547.00



LaVie Care Centers, LLC

Client: 120098  
Invoice: 3973790  
Invoice Date: 12/31/24

Task Code	Description	Hours	Amount
B280	Vendor Matters	5.50	7,342.50
B290	Insurance	12.60	16,380.00
B310	Claims Administration & Object	4.60	4,411.00
B320	Plan and Disclosure Statement	109.90	144,846.50
B470	Litigation	244.30	317,341.00
		596.60	797,891.50

**EXHIBIT B**

**Expense Detail**



LaVie Care Centers, LLC

Client: 120098  
Invoice: 3973790  
Invoice Date: 12/31/24

## Costs and Other Charges

Description	Amount
Business Meal	54.65
Business meal re travel to hearing on 10/7/2024 (J. Haake)	
Computer Research	5,207.53
Computer Research	
Computer Usage Charge - Data Review & Production Software	6,000.00
"October monthly fee for Discovery Platform Use (RelativityOne, 565.02 GBs)"	
Document Services	372.30
VENDOR: eScribers LLC; INVOICE#: 1052466; DATE: 10/30/2024 - Obtain transcript of hearing held on October 28, 2024, in In re LaVie Care Centers, LLC, et al., Case No. 24-55507 (PMB) (U.S. Bankruptcy Court for the Northern District of Georgia)	
Express Mail	95.42
VENDOR: Federal Express Corporation; INVOICE#: 863695981; DATE: 10/1/2024	
Obtain Copy of Transcripts	589.60
VENDOR: eScribers LLC; INVOICE#: 1035813; DATE: 10/1/2024 - Obtain transcript of hearing held on September 30, 2024, in In re LaVie Care Centers, LLC, et al., Case No. 24-55507 (PMB) (U.S. Bankruptcy Court for the Northern District of Georgia)	
Obtain Copy of Transcripts	481.80
VENDOR: eScribers LLC; INVOICE#: 1040842; DATE: 10/9/2024 - Obtain transcript of omnibus hearing held on October 8, 2024, in In re LaVie Care Centers, LLC, et al., Case No. 24-55507 (PMB) (U.S. Bankruptcy Court for the Northern District of Georgia)	
Search Fees	181.31
VENDOR: Chapter 11 Dockets; INVOICE#: 138161; DATE: 10/22/2024 - September 2024 usage	
Transportation/Parking	50.00
Parking for trip to Atlanta for motion to strike hearing on October 7 - 8, 2024 (N. Bull)	
Travel Expenses	1,109.71
Hotel stay on 9/10/2024 re mediation (N. Bull)	
Travel Expenses	534.89
Hotel stay on 9/29/2024 - 10/1/2024 re disclosure hearing (E. Keil)	
Travel Expenses	34.37
Uber ride from hotel to Atlanta airport on 10/1/2024 (E. Keil)	
Travel Expenses	163.47
Airfare to Chicago, IL on 10/1/2024 (E. Keil)	
Travel Expenses	70.00
Taxi from home to airport on 10/7/2024 (J. Haake)	
Travel Expenses	33.51
Taxi from airport to court on 10/7/2024 (J. Haake)	
Travel Expenses	867.96
Airfare from Dallas to Houston on 10/7/2024 (J. Haake)	





LaVie Care Centers, LLC

Client: 120098  
Invoice: 3973790  
Invoice Date: 12/31/24

Description	Amount
Travel Expenses	43.30
Taxi from airport to hotel on 10/7/2024 (N. Bull)	
Travel Expenses	105.39
Dinner meal on 10/7/2024 (N. Bull)	
Travel Expenses	1,057.10
Hotel stay on 10/7 - 10/8 for motion to strike hearing (N. Bull)	
Travel Expenses	400.48
Airfare to Atlanta, GA on 10/7/2024 (N. Bull)	
Travel Expenses	85.92
Taxi from hotel to Atlanta, GA airport on 10/8/2024 (N. Bull)	
Travel Expenses	480.48
Return airfare to Miami, FL on 10/8/2024 (N. Bull)	
Travel Expenses	438.70
Hotel stay on 10/7 - 10/8 for contested hearing (J. Haake)	
Travel Expenses	53.44
Taxi from hotel to airport on 10/8/2024 (J. Haake)	
Travel Expenses	40.20
Taxi from airport to home on 10/8/2024 (J. Haake)	
<b>Total Costs and Other Charges</b>	<b>\$18,551.53</b>

**EXHIBIT A-6**

**Sixth Monthly Fee Statement**

*November 1, 2024 – November 30, 2024*

**IN THE UNITED STATES BANKRUPTCY COURT  
NORTHERN DISTRICT OF GEORGIA  
ATLANTA DIVISION**

In re:	)	
	)	Chapter 11
LAVIE CARE CENTERS, LLC, <i>et al.</i> , <sup>1</sup>	)	
	)	Case No. 24-55507 (PMB)
Debtors.	)	(Jointly Administered)
	)	
	)	<b>Obj. Deadline: March 3, 2025</b>
	)	

**SUMMARY OF SIXTH MONTHLY FEE STATEMENT OF  
MCDERMOTT WILL & EMERY LLP, COUNSEL TO THE DEBTORS AND  
DEBTORS-IN-POSSESSION, FOR ALLOWANCE OF COMPENSATION AND  
REIMBURSEMENT OF EXPENSES FOR THE PERIOD  
FROM NOVEMBER 1, 2024 THROUGH NOVEMBER 30, 2024**

Name of Applicant:	<b>McDERMOTT WILL &amp; EMERY LLP</b>
Authorized to provide professional services to:	<b>Debtors and Debtors-in-Possession</b>
Date of retention:	<b>July 19, 2024, effective as of June 2, 2024</b>
Period for which compensation and reimbursement is sought:	<b>November 1, 2024 through November 30, 2024</b>
Amount of compensation sought as actual, reasonable and necessary:	<b>\$743,343.50</b>
Amount of expense reimbursement sought as actual, reasonable and necessary:	<b>\$24,932.93</b>
This is a:	<b>Sixth Monthly Fee Statement</b>

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<sup>1</sup> The last four digits of LaVie Care Centers, LLC's federal tax identification number are 5592. There are 282 Debtors in these chapter 11 cases, which are being jointly administered for procedural purposes only. A complete list of the Debtors and the last four digits of their federal tax identification numbers are not provided herein. A complete list of such information may be obtained on the website of the Debtors' claims and noticing agent at <https://www.veritaglobal.net/LaVie>. The location of LaVie Care Centers, LLC's corporate headquarters and the Debtors' service address is 1040 Crown Pointe Parkway, Suite 600, Atlanta, GA 30338.

**Prior Fee Statements:**

<b>Document</b>	<b>Date Served</b>	<b>Period Covered</b>	<b>Requested Fees/Expenses</b>	<b>Objections Served</b>
<b>First Monthly Fee Statement</b>	August 26, 2024	6/2/24 – 6/30/24	\$1,692,647.00 / \$38,882.94	None
<b>Second Monthly Fee Statement</b>	October 3, 2024	7/1/24 – 7/31/24	\$1,036,973.50 / \$13,899.83	None
<b>Third Monthly Fee Statement</b>	November 11, 2024	8/1/24 – 8/31/24	\$1,383,682.50 / \$23,579.78	None
<b>Fourth Monthly Fee Statement</b>	December 3, 2024	9/1/24 – 9/30/24	\$1,324,876.00 / \$21,775.63	None
<b>Fifth Monthly Fee Statement</b>	January 13, 2025	10/1/24 – 10/31/24	\$797,891.50 / \$18,551.53	None

**LAVIE CARE CENTERS, LLC, ET AL.  
SUMMARY OF BILLING BY PROFESSIONAL  
NOVEMBER 1, 2024 THROUGH NOVEMBER 30, 2024**

<b>Name of Professional Person</b>	<b>Date of Bar Admission</b>	<b>Position with the Applicant and Practice Area</b>	<b>Hourly Billing Rate</b>	<b>Total Billed Hours</b>	<b>Total Compensation</b>
Joel Haims	1994	Partner; Trial	\$1,830	2.0	\$3,660.00
Daniel M. Simon	2008	Partner; Corporate Advisory	\$1,650	134.0	\$221,100.00
Nathan M. Bull	2006	Partner; Trial	\$1,650	39.1	\$64,515.00
Brian Tiemann	2008	Partner; Employee Benefits and Executive Compensation	\$1,575	9.9	\$15,592.50
Jack G. Haake	2011	Associate; Corporate Advisory	\$1,335	44.9	\$59,941.50
Tim C. Cramton	2018	Associate; Trial	\$1,290	61.9	\$79,851.00
Alex Spisak	2014	Associate; Trial	\$1,245	3.5	\$4,357.50
Emily C. Keil	2018	Associate; Corporate Advisory	\$1,245	191.3	\$238,168.50
Catherine T. Lee	2021	Associate; Corporate Advisory	\$1,155	38.9	\$44,929.50
Hayden Putre	2021	Associate; Trial	\$925	1.1	\$1,017.50
Christopher Shoemaker	2023	Associate; Trial	\$805	2.1	\$1,690.50
Daniel Northrop	N/A	Paralegal; Corporate Advisory	\$745	7.4	\$5,513.00
Edward Kwon	N/A	Manager of Technology Project Management	\$570	3.4	\$1,938.00
Scott Bride	N/A	Senior Researcher	\$385	1.0	\$385.00

<b>Name of Professional Person</b>	<b>Date of Bar Admission</b>	<b>Position with the Applicant and Practice Area</b>	<b>Hourly Billing Rate</b>	<b>Total Billed Hours</b>	<b>Total Compensation</b>
Jacque Bishop Jones	N/A	Paralegal; Corporate Advisory	\$360	0.5	\$180.00
Daniel Valentino	N/A	Litigation Technology Data Analyst	\$280	0.8	\$224.00
Andy Garcia	N/A	Litigation Technology Data Analyst	\$280	1.0	\$280.00
<b>TOTALS</b>				<b>542.8</b>	<b>\$743,343.50</b>

**LAVIE CARE CENTERS, LLC, ET AL.  
COMPENSATION BY PROJECT CATEGORY  
NOVEMBER 1, 2024 THROUGH NOVEMBER 30, 2024**

<b>Project Category</b>	<b>Total Hours</b>	<b>Total Fees</b>
Case Administration	0.5	\$667.50
Relief from Stay / Adequate Protection Proceedings	2.2	\$2,547.00
Court Hearings	32.5	\$42,904.00
Fee/Employment Applications	5.6	\$6,272.00
Assumption/Rejection of Leases	15.8	\$18,771.00
Other Contested Matters	95.1	\$137,557.50
Non-Working Travel <sup>1</sup>	3.4	\$4,233.00
Business Operations	1.9	\$1,915.50
Financing/Cash Collections	0.2	\$149.00
Vendor Matters	3.4	\$4,539.00
Insurance	6.1	\$6,715.50
Claims Administration & Objections	3.4	\$4,233.00
Plan and Disclosure Statement	266.0	\$368,209.50
Litigation	106.7	\$144,630.00
<b>TOTALS</b>	<b>542.8</b>	<b>\$743,343.50</b>

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<sup>1</sup> The hours billed to Non-Working Travel were reduced by fifty percent (50%), as reflected in the time detail attached hereto as **Exhibit A**.



**LAVIE CARE CENTERS, LLC, ET AL.  
EXPENSE SUMMARY  
NOVEMBER 1, 2024 THROUGH NOVEMBER 30, 2024**

<b>Expense Category</b>	<b>Service Provider (if applicable)</b>	<b>Total Expenses</b>
Computer-Assisted Research	Various	\$13,216.29
Courier Services	Georgia Messenger Service LLC	\$28.98
Hearing Transcripts	eScribers LLC	\$1,168.00
Deposition Transcripts	Regency Reporting Service, Inc.	\$889.55
Travel Expenses	Various	\$2,438.90
Business Meals	Various	\$1,191.21
Discovery Hosting Charges	RelativityOne	\$6,000.00
<b>TOTAL</b>		<b>\$24,932.93</b>

**EXHIBIT A**

**Time Detail**



Invoice: 3983147  
Client: 120098

01/31/25

LaVie Care Centers, LLC  
1040 Crown Pointe Parkway  
Atlanta, GA 30338

For Services Rendered in Connection with:

Matter: 0013 Chapter 11

Task	Date	Name	Hours	Description
B110	11/18/24	J. Haake	0.50	Conference with D. Simon re administrative issues and correspondence with J. Brilliant re same (.5).
B140	11/07/24	J. Haake	0.40	Correspondence with W. Porter re relief from stay issue (.2); correspondence with Verita re service issues related to motion for relief from stay (.2).
B140	11/08/24	J. Haake	0.40	Correspondence with J. Rezac re lift stay motions (.4).
B140	11/15/24	D. Northrop	0.60	Review proposed stipulation and order granting relief from the automatic stay to, and resolving plan objection of, Mary Ann Iezzoni, as agent in fact for Angeline Lamana, and correspondence with J. Haake re proposed revision to the proposed stipulation and order (.1); revise proposed stipulation and order to add distribution list (.3); follow up correspondence with J. Haake re revised proposed stipulation and order (.1); upload proposed stipulation and order (.1).
B140	11/18/24	E. Keil	0.40	Revise stipulated order (.2); correspondence with A. Marchant-Lessa re same (.2).
B140	11/27/24	J. Haake	0.40	Conference with J. Rotstein re lift stay motion (.4).
B155	11/06/24	D. Northrop	0.10	Communications with E. Keil regarding status of the 11.7.2024 omnibus hearing, and preparing and filing a notice of cancellation of hearing (.1).
B155	11/06/24	E. Keil	0.20	Draft notice of cancelled hearing (.2).
B155	11/07/24	E. Keil	0.40	Draft notice of cancelled hearing (.2); correspondence with A. Marchant-Lessa re same (.1); correspondence with D. Northrop re same (.1).
B155	11/11/24	E. Keil	0.40	Draft exhibit list (.4).
B155	11/12/24	E. Keil	2.30	Draft confirmation demonstrative (2.3).
B155	11/12/24	D. Northrop	0.30	Review Debtors' agenda for 11.14.2024 hearing (.1); file Debtors' agenda for same (.2).



**McDermott  
Will & Emery**

LaVie Care Centers, LLC

Client: 120098  
Invoice: 3983147  
Invoice Date: 01/31/25

Task	Date	Name	Hours	Description
B155	11/13/24	E. Keil	2.90	Prepare for confirmation hearing, including compiling exhibits, revising exhibit list, and preparing demonstratives (2.9).
B155	11/14/24	C. Lee	3.10	Telephonically participate in confirmation hearing (3.1).
B155	11/14/24	E. Keil	8.00	Prepare for combined hearing (3.5); participate in combined confirmation hearing (4.5).
B155	11/14/24	N. Bull	3.50	Prepare for and participate in telephonic confirmation hearing (3.5).
B155	11/14/24	D. Simon	4.00	Travel to and participate in confirmation hearing (4.0).
B155	11/14/24	J. Haake	4.30	Prepare for and participate in court hearing for confirmation (4.3).
B155	11/18/24	D. Northrop	0.30	Obtain transcript of 11.14.2024 hearing (.1); review same (.1); correspondence with MWE team re same (.1).
B155	11/22/24	C. Lee	0.60	Virtually participate in oral ruling re confirmation, third-party releases (.6).
B155	11/22/24	D. Northrop	0.30	Prepare request for transcript of the court's 11.22.2024 oral ruling on plan confirmation and third party releases (.2); correspondence with transcription firm re transcript request (.1).
B155	11/22/24	E. Keil	1.50	Prepare for and participate in confirmation ruling (1.5).
B155	11/25/24	D. Northrop	0.30	Obtain transcript of the court's 11.22.2024 oral ruling on plan confirmation and third party releases (.1); review same (.1); correspondence with MWE team re same (.1).
B160	11/04/24	E. Keil	0.50	Revise Ankura financial reports (.5).
B160	11/13/24	E. Keil	0.70	Review and revise fee invoices for privilege issues and compliance with local rules (.7).
B160	11/19/24	E. Keil	1.10	Revise October Ankura staffing report (.3); review time detail for privilege issues and compliance with local rules (.8).
B160	11/20/24	D. Northrop	0.20	File OCP declaration for Daniel Coker Horton & Bell, P.A. (.2).
B160	11/22/24	D. Northrop	1.00	File monthly staffing report of Ankura Consulting Group, LLC for September 2024 (.2); review quarterly report of Ankura Consulting Group, LLC for the period 6.2.2024 through 8.31.2024 (.1); file



LaVie Care Centers, LLC

Client: 120098  
Invoice: 3983147  
Invoice Date: 01/31/25

Task	Date	Name	Hours	Description
				Ankura quarterly report (.2); review notice of quarterly statement of amounts paid to ordinary course professionals and notice of revised list of ordinary course professionals (.1); file notice of quarterly statement of amounts paid to ordinary course professionals and notice of revised list of ordinary course professionals (.4).
B160	11/22/24	E. Keil	0.90	Revise Ankura staffing and quarterly reports (.4); revise OCP summaries (.3); correspondence with D. Northrop re filing of same (.2).
B160	11/25/24	E. Keil	0.70	Draft September fee statement (.7).
B160	11/26/24	D. Northrop	0.20	File monthly staffing report of Ankura Consulting Group, LLC for October 2024 (.2).
B160	11/26/24	E. Keil	0.30	Finalize Ankura staffing report (.2); correspondence with D. Northrop re same (.1).
B185	11/01/24	E. Keil	1.80	Conference with K. Furr re Harts Harbor (.5); draft correspondence with J. Watson re same (.2); conference with J. Watson re same (.7); conferences with D. Simon re same (.4).
B185	11/04/24	C. Lee	7.20	Draft motion to reject Harts Harbor lease, transfer assets (1.8); research legal issues re same (2.6); review and analyze case law, precedent re same (2.8).
B185	11/06/24	C. Lee	2.80	Review and revise Harts Harbor rejection and transfer motion (2.7); correspond with E. Keil re same (.1).
B185	11/17/24	E. Keil	0.40	Review assumed contracts (.4).
B185	11/25/24	E. Keil	2.10	Revise HH rejection motion (.8); correspondence and conference with LEAF, J. Watson, et al. re cure amounts (1.3).
B185	11/26/24	E. Keil	1.10	Correspondence and conferences with D. Wen re LEAF cure amount (.8); correspondence and conference with Debtors re same (.3).
B185	11/27/24	E. Keil	0.40	Correspondence with J. Watson, G. Hayes, D. Simon re LEAF (.4).
B190	11/01/24	E. Keil	5.30	Prepare for and participate in deposition preparation conferences with B. Jones, R. Perry, N. Bull, et al. (4.8); conference with DOJ re provider agreements (.5).
B190	11/01/24	D. Simon	5.70	Conference with K. Furr re Harts Harbor (.3);



LaVie Care Centers, LLC

Client: 120098  
Invoice: 3983147  
Invoice Date: 01/31/25

Task	Date	Name	Hours	Description
				multiple conferences with B. Jones and others re deposition prep (3.5); review email production issues (.6); conference with litigation team re same (.5); settlement conference with J. Anthony (.8).
B190	11/02/24	D. Simon	0.70	Communications re litigation and discovery matters (.7).
B190	11/03/24	E. Keil	0.80	Prepare for depositions (.8).
B190	11/03/24	D. Simon	4.00	Participate in multiple deposition prep sessions (2.4); conferences with N. Bull and J. Muenker re various litigation and discovery matters (1.6).
B190	11/04/24	D. Simon	7.30	Participate in multiple deposition prep sessions (4.5); communications with N. Bull and B. Jones re same (1.0); internal communications re plan litigation and discovery matters (1.8).
B190	11/04/24	E. Keil	3.50	Prepare for depositions with B. Jones, J. Decker, et al. (3.5).
B190	11/05/24	E. Keil	4.90	Participate in B. Jones deposition (4.9).
B190	11/05/24	D. Simon	8.60	Prepare for and participate in B. Jones deposition (6.3); prep conference with J. Decker (1.0); conferences with N. Bull and T. Cramton re discovery and litigation matters (1.3).
B190	11/06/24	E. Keil	5.50	Participate in J. Decker deposition (3.7); conferences with D. Simon, T. Cramton, et al. re same (.4); conference with B. Jones, L. Halperin, N. Bull, D. Simon, et al. re same (.8); conference with R. Ahmed re same (.6).
B190	11/06/24	D. Simon	10.40	Prepare for Decker deposition (1.2); meetings with J. Lombardo re same (.3); participate in Decker deposition (3.4); numerous internal conferences and analysis re privilege matters and related considerations (4.7); conference with DIP lenders re same (.8).
B190	11/07/24	D. Simon	4.00	Numerous conferences with DIP lenders re privilege matters and investigation issues (2.5); conferences with internal litigation team and client re same (1.5).
B190	11/13/24	E. Keil	1.90	Conference with IRS re ERC issue (1.0); conference with J. Muenker, B. Jones, et al. re same (.9).
B190	11/13/24	B. Tiemann	1.00	Review DOJ request for information on employee retention credit (.3); review and analyze organization charts to determine large or small



LaVie Care Centers, LLC

Client: 120098  
Invoice: 3983147  
Invoice Date: 01/31/25

Task	Date	Name	Hours	Description
				employer status for claiming employee retention credit (.5); correspondence with E. Keil and D. Simon re same (.2).
B190	11/15/24	E. Keil	2.70	Correspondence with D. Simon re IRS issues (.3); research re same (2.4).
B190	11/15/24	J. Bishop Jones	0.50	Communications with J. Haake (.1); process document production (.3); circulate same to OPC (.1).
B190	11/18/24	E. Keil	5.60	Research re [REDACTED] (3.6); conferences with B. Tiemann, M. Krakovksy re same (.7); research re [REDACTED] (1.3).
B190	11/18/24	B. Tiemann	0.50	Conference with E. Keil and D. Simon re DOJ request for information on employee retention credit (.5).
B190	11/19/24	E. Keil	5.70	Research re [REDACTED] (3.5); conference with D. Simon re same (.5); conference with G. Hayes, C. Bryson, et al. re same (.3); draft 9019 motion (1.4).
B190	11/20/24	E. Keil	3.10	Revise adversary proceeding consent order (.6); correspondence with J. Anthony, N. Lafalce, A. Marchant-Lessa re same (.4); correspondence with D. Northrop re uploading same (.1); draft briefing schedule re IRS dispute (.4); correspondence with D. Simon re same (.1); correspondence with IRS re same (.1); research re same (1.4).
B190	11/20/24	D. Northrop	0.30	Review second proposed agreed order (i) further extending the automatic stay and/or preliminarily enjoining claims and causes of action against non-Debtor defendants and (ii) scheduling continued contingent hearing on 12.10.2024 in Adv. Pro. 24-5127 (.1); upload second proposed order (.1); review as-entered second agreed stay order in Adv. Pro. 24-5127 and correspondence with MWE team re same (.1).
B190	11/21/24	B. Tiemann	1.20	Conference with G. Hayes, J. Hurst, E. Keil and K. Lanier re payroll tax filings (1.2).
B190	11/22/24	E. Keil	1.60	Correspondence with V. Jones re IRS POCs (.2); review documents re same and upload to DOJ (1.4).
B190	11/22/24	B. Tiemann	3.00	Review and analyze Synergi Partners memos on





LaVie Care Centers, LLC

Client: 120098  
Invoice: 3983147  
Invoice Date: 01/31/25

Task	Date	Name	Hours	Description
				eligibility for employee retention credit and DLA Piper memo outlining use of decline in patients served as measurement for time employees were paid for not performing services (2.3); conference with W. Benson, H. Bilicki, V. Jones, E. Keil and D. Simon re payroll tax filings and employee retention credit (.7).
B190	11/25/24	E. Keil	1.60	Review IRS documents and upload same for IRS (1.6).
B190	11/25/24	B. Tiemann	1.50	Draft letter to DOJ responding to request for information on employee retention credit (1.5).
B190	11/26/24	E. Keil	0.90	Review ERC letter (.4); correspondence and conferences with D. Simon, B. Tiemann re same (.5).
B190	11/26/24	B. Tiemann	2.50	Continue drafting letter to DOJ responding to request for information on employee retention credit (2.0); conference and correspondence with E. Kiel and D. Simon re same (.3); prepare signature copy of letter and exhibits (.2).
B190	11/27/24	E. Keil	0.60	Revise ERC letter (.4); correspondence with D. Simon re same (.2).
B190	11/27/24	B. Tiemann	0.20	Correspondence with D. Simon re exhibits to letter responding to DOJ request for information on employee retention credit (.2).
B195	11/11/24	E. Keil	1.60	Travel to Atlanta from Chicago for confirmation hearing (travel time billed at 50%) (1.6).
B195	11/15/24	E. Keil	1.80	Travel to Chicago from Atlanta following confirmation hearing (travel time billed at 50%) (1.8).
B210	11/06/24	D. Northrop	0.10	Review patient care ombudsman report for the period 6.19.2024 through 9.25.2024 for 11565 Harts Road Operations LLC, and correspondence with MWE team re same (.1).
B210	11/20/24	D. Northrop	0.10	Review second ombudsman report for period 9.8.2024 through 11.7.2024 filed by the State Long-Term Care Ombudsman for Virginia, and correspondence with MWE team re same (.1).
B210	11/26/24	D. Northrop	0.70	File monthly operating reports for October 2024 for three separate Debtor groups (.7).
B210	11/26/24	E. Keil	1.00	Review October MORs (.7); correspondence with D.



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LaVie Care Centers, LLC

Client: 120098  
Invoice: 3983147  
Invoice Date: 01/31/25

Task	Date	Name	Hours	Description
				Northrop, J. Brilliant re same (.3).
B230	11/06/24	D. Northrop	0.20	File notice of revised DIP budget (.2).
B280	11/19/24	J. Haake	0.60	Analysis of vendor issue and correspondence with A. Edson re same (.6).
B280	11/21/24	J. Haake	1.50	Correspondence with S. Brazill re vendor issue and analysis of documents related to same (.7); conference and correspondence with M. Gunther re violation of stay (.8).
B280	11/26/24	J. Haake	1.30	Revise agreed orders (1.1); correspondence with L. Wolgast and D. Northrop re same (.2).
B290	11/07/24	J. Haake	0.50	Correspondence with J. Brilliant and J. Muenker re insurance issues (.5).
B290	11/13/24	A. Spisak	2.00	Review insurance policies of Debtor to respond to insurance questions raised by interested parties in matter (2.0).
B290	11/13/24	C. Shoemaker	2.10	Review Debtor insurance policies to address questions raised by interested parties (2.1).
B290	11/14/24	A. Spisak	0.50	Review insurance policies of Debtor to respond to insurance questions raised by interested parties in matter (.5).
B290	11/17/24	A. Spisak	1.00	Review insurance policies of Debtor to respond to insurance questions raised by interested parties in matter (1.0).
B310	11/21/24	E. Keil	3.40	Conference with G. Hayes, B. Tiemann, et al. re IRS proofs of claim (1.1); review analysis and materials re same (2.3).
B320	11/01/24	C. Lee	0.10	Correspond with MWE team re Chubb plan issues (.1).
B320	11/01/24	E. Keil	2.70	Revise B. Jones declaration (2.1); revise assumed contracts schedule (.6).
B320	11/01/24	D. Simon	2.40	Conference with DOJ re confirmation order language (.5); conference with Welltower re plan matters (.5); numerous conferences with E. Keil re various objections and resolutions (1.4).
B320	11/02/24	J. Haims	1.00	Review and revise draft of Decker affidavit in support of plan confirmation, and correspondence re same (1.0).
B320	11/02/24	E. Keil	0.80	Revise B. Jones declaration (.8).
B320	11/02/24	D. Simon	1.20	Review and revise Decker declaration (1.2).
B320	11/03/24	E. Keil	7.00	Revise Decker declaration (1.4); revise confirmation



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LaVie Care Centers, LLC

Client: 120098  
Invoice: 3983147  
Invoice Date: 01/31/25

Task	Date	Name	Hours	Description
				order (5.6).
B320	11/03/24	D. Simon	0.50	Conferences with J. Muenker and P. Martin re Powerback matters (.5).
B320	11/04/24	J. Haake	2.40	Prepare for and participate in conference with Chubb re insurance issues (1); prepare for and participate in conference with F. Lawell and J. Bonteque re same (1.1); correspondence with D. Simon and E. Keil re same (.3).
B320	11/04/24	J. Haims	1.00	Review and revise draft of Decker affidavit in support of plan confirmation, and correspondence re same (1.0).
B320	11/04/24	D. Simon	3.00	Communications with E. Keil and objecting parties re objection and resolutions (.8); review objections (1.2); conferences with J. Anthony re settlement (1.0).
B320	11/04/24	E. Keil	8.00	Review plan objections (1.8); draft summary chart re same (3.4); conference with D. Simon re same (.4); conference with R. Ahmed re same (.9); correspondence with various parties re plan supplement (.4); conference with M. Blumin re same (.2); revise confirmation order (.4); revise Decker declaration (.5).
B320	11/05/24	C. Lee	8.40	Research legal issues re plan confirmation (3.6); review and analyze case law, analysis re same (3.9); summarize findings re same (.8); correspond with E. Keil re same (.1).
B320	11/05/24	J. Haake	2.60	Research confirmation issues and correspondence with E. Keil re same (2.6).
B320	11/05/24	E. Keil	8.60	Revise confirmation objection chart (.3); revise confirmation order (3.1); revise confirmation brief (2.8); conference with D. Simon re same (.9); revise plan supplement (1.5).
B320	11/05/24	D. Simon	1.70	Communications with E. Keil and others re plan objections and open (1.2); review same (.5).
B320	11/05/24	D. Northrop	0.20	File notice of filing of first amended plan supplement (.2).
B320	11/06/24	J. Haake	1.30	Conference with J. Bonteque re plan objection, and correspondence with D. Simon and E. Keil re same (.8); conference with J. Bonteque re settlement conference (.5).



LaVie Care Centers, LLC

Client: 120098  
Invoice: 3983147  
Invoice Date: 01/31/25

Task	Date	Name	Hours	Description
B320	11/06/24	C. Lee	1.80	Research legal issues re plan confirmation (1.6); conference with Amerihealth counsel re objection (.1); correspond with E. Keil re same (.1).
B320	11/06/24	D. Northrop	0.10	Review objection of the United States of America, on behalf of the United States Department of Health and Human Services and the United States Department of Veteran Affairs to second amended combined disclosure statement and joint chapter 11 plan of reorganization, and correspondence with MWE team re same (.1).
B320	11/06/24	E. Keil	2.50	Revise confirmation brief (2.5).
B320	11/06/24	D. Simon	1.60	Numerous communications with E. Keil re plan objections, supplements and other matters (1.6).
B320	11/07/24	J. Haake	1.40	Conference with J. Bonteque and review proposed confirmation order language (1.2); correspondence with E. Keil re same (.2).
B320	11/07/24	C. Lee	2.40	Research legal issues re confirmation (1.8); summarize findings re same (.4); correspond with E. Keil re same (.2).
B320	11/07/24	E. Keil	11.10	Research re confirmation objections (2.7); revise confirmation brief (6.3); conference with D. Simon re same (.6); revise declarations in support of confirmation (1.5).
B320	11/07/24	D. Simon	5.20	Numerous conferences and communications with objecting parties re plan objections and related matters (2.4); settlement conference with J. Anthony (1.6); conference with other interested parties re settlement matters (1.2).
B320	11/08/24	J. Haake	2.60	Review insurance issues and correspondence with E. Keil re same (1.1); correspondence with F. Lawall and J. Bonteque re plan objection and settlement conference (.9); prepare for and participate in conference with J. Muenker re plan and insurance issues (.6).
B320	11/08/24	C. Lee	1.30	Research legal issues re confirmation (1.2); correspond with E. Keil re same (.1).
B320	11/08/24	D. Simon	4.80	Settlement conference with J. Anthony (1.0); conferences with other parties re J. Anthony settlement (.6); numerous communications with committee and other parties re plan negotiations and



LaVie Care Centers, LLC

Client: 120098  
Invoice: 3983147  
Invoice Date: 01/31/25

Task	Date	Name	Hours	Description
				confirmation matters (3.2).
B320	11/08/24	E. Keil	9.40	Revise confirmation brief, confirmation order, and declarations in support of same (8.3); conference with J. Haake re same (.3); conferences with D. Simon re same (.6); conference with MidCap re same (.2).
B320	11/09/24	E. Keil	6.50	Revise confirmation brief (6.1); revise confirmation order (.4).
B320	11/09/24	D. Simon	3.50	Revise declarations and brief in support of confirmation (3.0); conferences with J. Muenker re DOJ and other objections (.5).
B320	11/10/24	J. Haake	0.40	Review comments to plan by committee (.2); correspondence with D. Kovsky re same (.2).
B320	11/10/24	E. Keil	1.70	Revise confirmation brief (1.7).
B320	11/10/24	D. Simon	3.90	Revise brief and order (2.7); multiple conferences and communications with objecting parties re plan confirmation matters (1.2).
B320	11/11/24	C. Lee	2.10	Draft motion to extend page limits for confirmation brief (1.4); review and analyze local rules re same (.6); correspond with E. Keil re same (.1).
B320	11/11/24	J. Haake	4.20	Prepare for and participate in conference with J. Bonteque re insurance and plan issues (1.5); follow up conference with J. Bonteque (.8); prepare for and participate in conference with F. Lawall and D. Kovsky re plan language (1.3); revise draft language for confirmation order re workers insurance (.6).
B320	11/11/24	D. Simon	10.40	Multiple conferences and analysis re DOJ matters (1.8); negotiate plan objection language and confirmation order matters (2.8); review and revise plan and related documents (1.3); review and revise confirmation brief and related declarations (4.5).
B320	11/11/24	E. Keil	8.90	Revise confirmation brief, declarations in support of same (5.3); revise motion to exceed page limit (.5); revise plan (.8); conferences with D. Simon re same (1.1); conference with J. Muenker, D. Simon re plan, plan supplement (.5); conference with DOJ re confirmation order (.5); conference with K. Furr re same (.2).
B320	11/12/24	J. Haake	4.40	Revise Chubb language (1.2); conferences and correspondence with F. Lawall and D. Kovsky (1.0);



LaVie Care Centers, LLC

Client: 120098  
Invoice: 3983147  
Invoice Date: 01/31/25

Task	Date	Name	Hours	Description
				correspondence with D. Simon re insurance issues (.5); conferences with J. Bonteque re same and settlement of objection (1.7).
B320	11/12/24	D. Simon	9.50	Numerous conferences with committee, DIP lenders and others re plan confirmation objections and negotiations (4.6); conference re IRS and ERC matters (1.2); prepare for confirmation hearing (3.7).
B320	11/12/24	E. Keil	12.10	Revise confirmation brief (3.1); revise plan re asset sale structure (3.4); conferences with D. Simon, J. Muenker re same (1.3); revise confirmation order, declarations in support of confirmation (2.9); conference with F. Lawall, D. Kovsky re confirmation (.5); conference with Synergy team re IRS (.9).
B320	11/12/24	D. Northrop	1.10	Review Debtors' confirmation brief (as to form and technical specifications and requirements) (.1); file confirmation brief (.2); review Debtors' motion for leave to exceed page limit with respect to confirmation brief (.1); analyze ECF filing events and related research re local practice to determine which ECF filing event to use in filing motion for leave to exceed page limit (.1); communications with E. Keil re same (.1); file Debtors' motion for leave to exceed page limit with respect to confirmation brief (.2); review proposed order to be uploaded to the court re Debtors' motion for leave to exceed page limit with respect to confirmation brief and correspondence with E. Keil re revision to proposed order (.1); upload proposed order for Debtors' motion for leave to exceed page limit with respect to confirmation brief via ECF (.1); review court's order entered 11.12.2024 granting Debtors' motion for leave to exceed page limit with respect to confirmation brief and correspondence with MWE team re same (.1).
B320	11/12/24	C. Lee	0.10	Correspond with J. Haake re plan confirmation research (.1).
B320	11/13/24	J. Haake	10.50	Prepare for confirmation hearing, and prepare for and participate in multiple lengthy conferences with F. Lawall and D. Kovsky re insurance and



LaVie Care Centers, LLC

Client: 120098  
Invoice: 3983147  
Invoice Date: 01/31/25

Task	Date	Name	Hours	Description
				confirmation issues (2.8); conference with D. Simon re same (.6); conferences and correspondence with T. Brink re same (1.3); revise draft confirmation order language and correspondence with J. Bonteque re same (1.1); correspondence with J. Bonteque re plan (.7); research insurance issues as they relate to confirmation and correspondence with A. Spisak and C. Lee re same (1.6); prepare for contested confirmation hearing re insurance issues and objections (1.5); conferences with lift stay movants re confirmation hearing (.9).
B320	11/13/24	C. Lee	7.10	Research legal issues re plan confirmation (2.4); review and analyze case law re same (3.2); summarize findings re same (1.0); correspond with J. Haake re same (.5).
B320	11/13/24	E. Keil	9.20	Revise confirmation order (2.3); revise plan (3.9); conferences with D. Simon, J. Muenker re same (.6); revise and compile plan supplement (1.2); conference with MidCap re revised plan (.3); conference with UCC re same (.5); correspondence with key stakeholders re updated plan documents (.4).
B320	11/13/24	D. Northrop	1.10	Review notice of filing of second amended plan supplement and correspondence with E. Keil re revision to same (.1); revise notice of filing of second amended plan supplement (.1); communication with E. Keil re appropriate ECF filing event for Debtors' modified second amended combined disclosure statement and joint chapter 11 plan of reorganization (.1); file notice of filing of second amended plan supplement, modified second amended combined disclosure statement and joint chapter 11 plan of reorganization, and proposed confirmation order (.8).
B320	11/13/24	D. Simon	14.90	Numerous conferences with DOJ, Chubb, committee, UST and other objecting parties (5.5); meetings with client re hearing prep (2.0); meetings with E. Keil and J. Haake re hearing prep matters (1.2); review and comment on modified plan and conformation order issues (1.7); prepare for hearing





LaVie Care Centers, LLC

Client: 120098  
Invoice: 3983147  
Invoice Date: 01/31/25

Task	Date	Name	Hours	Description
				(4.5).
B320	11/14/24	J. Haake	2.90	Prepare for and participate in conference with J. Bonteque re Chubb comments to plan (1.2); prepare for and participate in conference with D. Kovsky re confirmation order language (.8); correspondence with J. Muenker re Iezzoni order (.3); correspondence with N. Brannick re confirmation hearing and stipulation and order (.6).
B320	11/14/24	E. Keil	1.30	Revise plan, confirmation order re requested comments (1.3).
B320	11/14/24	D. Simon	6.50	Prepare for confirmation hearing (4.0); numerous conferences re plan issues and negotiations with Chubb, IRS, committee and others (2.5).
B320	11/15/24	J. Haake	1.80	Correspondence with E. Keil and parties re confirmation order language and submitting agreed Iezzoni order (1.8).
B320	11/15/24	E. Keil	1.80	Revise plan, confirmation order (1.4); correspondence with objecting parties re same (.4).
B320	11/15/24	D. Simon	0.80	Follow up conference with C. Bryson, D. Dias and G. Hayes re next steps (.8).
B320	11/17/24	E. Keil	1.60	Revise confirmation order, plan supplement, plan (1.6).
B320	11/18/24	E. Keil	0.90	Correspondence with F. Lawall, D. Kovsky re plan documents (.5); revise plan (.4).
B320	11/18/24	D. Simon	3.00	Numerous conferences with client, E. Keil and others re IRS matters (2.3); communications with committee re plan matters (.7).
B320	11/19/24	E. Keil	0.70	Revise plan, confirmation order re court's comments (.7).
B320	11/19/24	D. Simon	3.70	Multiple conferences and review of ERC issues (.8); review and negotiation of plan comments and modifications to plan supplement documents (1.1); conferences with E. Keil and J. Muenker re same (.4); review medical records issued (.8); conferences re same (.6).
B320	11/20/24	E. Keil	1.70	Revise plan, confirmation order for UCC comments (.9); conference with D. Simon re same (.4); correspondence with D. Simon, J. Muenker re same (.2); correspondence with F. Lawall, D. Kovsky re same (.2).



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LaVie Care Centers, LLC

Client: 120098  
Invoice: 3983147  
Invoice Date: 01/31/25

Task	Date	Name	Hours	Description
B320	11/20/24	D. Simon	1.90	Numerous conferences with committee, plan sponsor and others re modifications to the confirmation order and plan (1.2); conferences with E. Keil re same (.3); review plan mark-up re same (.4).
B320	11/21/24	D. Simon	2.30	Multiple conferences re comments to confirmation order (1.2); analysis re tax matters (.8); conference with E. Keil re same (.3).
B320	11/21/24	D. Northrop	0.20	File notice of virtual oral ruling re third party releases (scheduled for 11.22.2024) (.2).
B320	11/21/24	E. Keil	3.70	Conference with F. Lawall, D. Kovsky, J. Muenker re plan and confirmation order (.7); revise plan, confirmation order, plan supplement re same (1.8); correspondence with A. Marchant-Lessa, objecting parties re confirmation ruling (.5); draft notice of virtual ruling (.4); correspondence with A. Marchant-Lessa re same (.2); correspondence with D. Northrop re filing of same (.1).
B320	11/22/24	E. Keil	3.00	Conference with J. Decker, B. Jones, et al. re confirmation ruling (.4); correspondence with key constituents re confirmation order, plan (.5); revise same (1.3); research re same (.6); correspondence with J. Adams re same (.2).
B320	11/22/24	D. Simon	2.50	Conferences with IRS re ERC matters (.7); follow up conference with B. Tiemann and E. Keil re same (.5); participate in oral ruling (.5); follow up conference re same (.8).
B320	11/23/24	D. Simon	0.80	Multiple conferences and review business record matters (.8).
B320	11/24/24	E. Keil	0.60	Revise confirmation order (.4); correspondence with MidCap re same (.2).
B320	11/25/24	E. Keil	2.80	Revise plan, confirmation order (1.3); conferences with D. Simon re same (.5); conference with D. Kovsky, F. Lawall re same (1.0).
B320	11/25/24	D. Simon	1.50	Multiple conferences with committee, Chubb and others re plan language issues (.8); conferences with J. Muenker and B. Jones re same (.7).
B320	11/26/24	E. Keil	4.30	Revise plan, confirmation order, plan supplement (3.2); correspondence with J. Adams re same (.2); correspondence with Chubb, UCC, et al. re same



LaVie Care Centers, LLC

Client: 120098  
Invoice: 3983147  
Invoice Date: 01/31/25

Task	Date	Name	Hours	Description
				(.9).
B320	11/26/24	D. Simon	2.20	Conferences with Synergy re regulatory matters (.3); multiple negotiations re remaining plan language matters (1.3); review ERC response letter and internal conference re same (.6).
B320	11/27/24	J. Haake	0.50	Prepare for and participate in conference with J. Bonteque re insurance language in confirmation order (.5).
B320	11/27/24	E. Keil	2.80	Conference with Chubb, UCC, L. Aiken, et al. re confirmation order (.2); revise same, plan, plan supplement (1.8); correspondence and conferences with D. Simon re same (.5); correspondence with A. Marchant-Lessa re same (.3).
B320	11/27/24	D. Simon	1.50	Conferences with Chubb, Omega and others re remaining plan language issues (.7); negotiate same (.8).
B470	11/01/24	S. Bride	1.00	Research cases [REDACTED] (1.0).
B470	11/01/24	T. Cramton	9.40	Check rules on verification requirements and send updated supplemental rog responses to B. Jones with comments (.4); review notes from 10/31 meet-and-confer and send draft correspondence memorializing deposition schedule and outstanding items, expert issues, and exhibit exchange, including related correspondence and internal conference on same (1.7); deposition preparation conferences and related items (4.2); revise and re-circulate updated supplemental rogs, and correspondence and internal conference with MWE team re same (2.1); coordinate final productions and service of supplemental rogs (.7); conference with N. Bull re same (.3).
B470	11/01/24	C. Lee	1.90	Research legal issues re [REDACTED] (1.8); correspond with D. Simon, MWE team re same (.1).
B470	11/01/24	N. Bull	3.50	Multiple conferences with MWE team and client re deposition preparation (3.5).
B470	11/01/24	E. Kwon	0.80	Finalize document production and provide to client (.8).



LaVie Care Centers, LLC

Client: 120098  
Invoice: 3983147  
Invoice Date: 01/31/25

Task	Date	Name	Hours	Description
B470	11/02/24	T. Cramton	0.70	Prepare for J. Decker deposition (.5); correspondence and internal conference with MWE team on depo prep (.2).
B470	11/03/24	T. Cramton	8.70	Multiple correspondence and internal conference with MWE team on deposition prep (.4); prepare and compile topics and questions for B. Jones and circulate same to MWE team (1.3); review Herskowitz and Carter affidavits and begin drafting deposition outlines (4.6); deposition preparation conference with MWE team and B. Jones (2.4).
B470	11/04/24	T. Cramton	8.20	Multiple correspondence and internal conference with MWE team on depositions/discovery-related issues and upcoming status conference (.5); analyze Florida claimants and categorize facilities by landlord, then pull leases and identify key provisions re OTAs, and report findings to D. Simon on same (1.5); deposition preparation with client and MWE team (.7); correspondence and internal conference with E. Keil re same (.3); complete initial draft of Herskowitz deposition outline and send to N. Bull with comments, including follow up conference on same (4.5); correspondence and internal conference with MWE team on depositions and communications with opposing counsel on same (.7).
B470	11/04/24	N. Bull	6.40	Multiple conferences with MWE team and client re deposition preparation (5.4); prepare for deposition (1.0).
B470	11/05/24	T. Cramton	9.20	Multiple correspondence and internal conference with MWE team on deposition preparation and related issues (1.5); participate in B. Jones deposition (5.2); begin expert deposition outline (2.5).
B470	11/05/24	E. Kwon	0.20	Coordinate preparing for case development review in the discovery document repository (.2).
B470	11/05/24	N. Bull	8.00	Participate in deposition (6.0); multiple conferences with client and MWE team re deposition preparation



LaVie Care Centers, LLC

Client: 120098  
 Invoice: 3983147  
 Invoice Date: 01/31/25

Task	Date	Name	Hours	Description
B470	11/06/24	E. Kwon	1.50	(1.0); revise memorandum (1.0). Coordinate preparing documents for case development review in the discovery document repository (1.5).
B470	11/06/24	H. Putre	1.10	Review documents re lease operations transfer provisions (1.0); confer with T. Cramton re same (.1).
B470	11/06/24	T. Cramton	11.40	Conference with N. Bull on depositions, discovery, outstanding items for hearing/deposition preparation, and other related-workstreams (.6); coordinate additional productions, including correspondence and internal conference with MWE case team and e-discovery team (1.5); participate in J. Decker deposition (5.0); follow up conferences with MWE and Chapman re same (1.5); conferences with D. Simon and N. Bull re same (1.7); follow up conferences and analysis on privilege issues, including review of relevant case law (1.1).
B470	11/06/24	A. Garcia	1.00	Ingest data for processing and populate custodian information in preparation to load into review platform (.2); monitor status to ensure deadline compliance and troubleshoot processing exception (.2); integrate data selected for review into review platform (.2); build incremental dtSearch index and run search term report (.2); conduct QC on data processed to ensure file count is correct and all natives and texts are present (.2).
B470	11/06/24	N. Bull	6.80	Participate in deposition (3.8); multiple conferences with MWE team re discovery and strategy (2.0); revise deposition outline (1.0).
B470	11/07/24	D. Valentino	0.80	Process data, resolve technical issues and promote documents for attorney review (.3); conduct final QC ensuring natives, text and metadata present (.2); update search index and search term reports (.3).
B470	11/07/24	T. Cramton	10.00	Internal MWE-Chapman conferences re depositions (1.5); coordinate with MWE e-discovery team for potential production (.5); revise and circulate draft cover letter for proposed document production (.8);





LaVie Care Centers, LLC

Client: 120098  
Invoice: 3983147  
Invoice Date: 01/31/25

Task	Date	Name	Hours	Description
				continue work on expert deposition outline (4.5); review and analyze J. Decker deposition transcript, including conferences with N. Bull on same (1.0); conferences and correspondence with MWE team re same (1.7).
B470	11/07/24	E. Kwon	0.90	Prepare documents for production (.9).
B470	11/07/24	N. Bull	8.50	Multiple conferences with MWE team, client and sponsor counsel re strategy and discovery (6.5); revise correspondence to Recovery Corp. (.5); prepare for depositions (1.5).
B470	11/08/24	T. Cramton	0.60	Review updated and revised declarations, including correspondence and internal conference on same (.5); settlement updates (.1).
B470	11/08/24	N. Bull	1.00	Review deposition transcripts (.5); conferences with MWE team re strategy (.5).
B470	11/11/24	N. Bull	1.00	Review correspondence and pleadings for confirmation hearing (1.0).
B470	11/15/24	T. Cramton	0.50	Update on confirmation hearing (.2); conference with N. Bull on potential litigation re IRS objection (.3).
B470	11/18/24	T. Cramton	0.50	Preliminary review of 11.14.2024 confirmation hearing transcript (.5).
B470	11/19/24	T. Cramton	1.60	Further review of 11.14.2024 confirmation hearing transcript, including re IRA issue (1.2); correspondence with D. Simon, J. Haims, and N. Bull re same (.4).
B470	11/22/24	T. Cramton	0.70	Prepare for and participate in confirmation ruling (.5); follow up correspondence and internal conference with MWE team on confirmation ruling (.2).
B470	11/22/24	N. Bull	0.40	Multiple correspondence with MWE team re confirmation order (.4).
B470	11/25/24	T. Cramton	0.40	Preliminary review of 11.22.2024 confirmation hearing/ruling transcript (.4).



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LaVie Care Centers, LLC

Client: 120098  
Invoice: 3983147  
Invoice Date: 01/31/25

Task	Date	Name	Hours	Description
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**Total Hours 542.80**

### Timekeeper Summary

Name	Hours	Rate	Amount
J. Bishop Jones	0.50	360.00	180.00
S. Bride	1.00	385.00	385.00
N. Bull	39.10	1,650.00	64,515.00
T. Cramton	61.90	1,290.00	79,851.00
A. Garcia	1.00	280.00	280.00
J. Haake	44.90	1,335.00	59,941.50
J. Haims	2.00	1,830.00	3,660.00
E. Keil	191.30	1,245.00	238,168.50
E. Kwon	3.40	570.00	1,938.00
C. Lee	38.90	1,155.00	44,929.50
D. Northrop	7.40	745.00	5,513.00
H. Putre	1.10	925.00	1,017.50
C. Shoemaker	2.10	805.00	1,690.50
D. Simon	134.00	1,650.00	221,100.00
A. Spisak	3.50	1,245.00	4,357.50
B. Tiemann	9.90	1,575.00	15,592.50
D. Valentino	0.80	280.00	224.00
<b>Totals</b>	<b>542.80</b>		<b>\$743,343.50</b>

### Task Code Summary

Task Code	Description	Hours	Amount
B110	Case Administration	0.50	667.50
B140	Relief from Stay/Adequate Protection Proceedings	2.20	2,547.00
B155	Court Hearings	32.50	42,904.00
B160	Fee/Employment Applications	5.60	6,272.00
B185	Assumption/Rejection of Leases	15.80	18,771.00
B190	Other Contested Matters	95.10	137,557.50
B195	Non-Working Travel	3.40	4,233.00
B210	Business Operations	1.90	1,915.50





LaVie Care Centers, LLC

Client: 120098  
Invoice: 3983147  
Invoice Date: 01/31/25

Task Code	Description	Hours	Amount
B230	Financing/Cash Collections	0.20	149.00
B280	Vendor Matters	3.40	4,539.00
B290	Insurance	6.10	6,715.50
B310	Claims Administration & Object	3.40	4,233.00
B320	Plan and Disclosure Statement	266.00	368,209.50
B470	Litigation	106.70	144,630.00
		542.80	743,343.50

**EXHIBIT B**

**Expense Detail**



LaVie Care Centers, LLC

Client: 120098  
Invoice: 3983147  
Invoice Date: 01/31/25

## Costs and Other Charges

Description	Amount
Business Meal	36.26
Lunch meal with Ben Jones of LaVie Care Centers on 11/4 (D. Simon)	
Business Meal	25.81
Dinner meal on 11/11 (E. Keil)	
Business Meal	13.48
Dinner meal on 11/12 (E. Keil)	
Business Meal	1,000.00
Celebratory dinner with client LaVie (D. Simon)	
Business Meals	115.66
VENDOR: ezCater, Inc.; INVOICE#: INVE-49289; DATE: 11/15/2024 - LaVie meeting	
Computer Research	13,109.31
Computer Research	
Computer Usage Charge - Data Review & Production Software	6,000.00
"November monthly fee for Discovery Platform Use (RelativityOne, 572.95 GBs)"	
Document Services	889.55
VENDOR: Regency Reporting Service, Inc.; INVOICE#: 18649; DATE: 11/18/2024 - rough draft and copies of deposition of James Decker taken on 11/6/2024 regarding LaVie Care Centers, LLC	
Document Services	963.60
VENDOR: eScribers LLC; INVOICE#: 1061671; DATE: 11/18/2024 - obtain transcript of hearing held on November 14, 2024, in In re LaVie Care Centers, LLC, et al., Case No. 24-55507 (PMB) (U.S. Bankruptcy Court for the Northern District of Georgia)	
Document Services	204.40
VENDOR: eScribers LLC; INVOICE#: 1065373; DATE: 11/25/2024 - obtain transcript of November 22, 2024 oral ruling in In re LaVie Care Centers, LLC, et al., Case No. 24-55507 (PMB) (U.S. Bankruptcy Court for the Northern District of Georgia)	
Messenger/Courier	28.98
VENDOR: Georgia Messenger Service LLC; INVOICE#: 8547-340; DATE: 11/16/2024 - courier service to deliver binders to courthouse	
Search Fees	106.98
VENDOR: Chapter 11 Dockets; INVOICE#: 138902; DATE: 11/13/2024 - October 2024 usage	
Travel Expenses	597.19
Round trip airfare (Chicago - Atlanta) for LaVie confirmation hearing on 11/11 - 11/15 (E. Keil)	
Travel Expenses	56.92
Lyft ride to Chicago airport from home on 11/11 (E. Keil)	
Travel Expenses	33.89
Lyft ride from Atlanta airport to hotel on 11/11 (E. Keil)	



LaVie Care Centers, LLC

Client: 120098  
Invoice: 3983147  
Invoice Date: 01/31/25

Description	Amount
Travel Expenses	299.26
Hotel in Atlanta for confirmation hearing (hearing was cancelled - hotel would not waive the cancellation penalty - T. Cramton)	
Travel Expenses	16.57
Lyft ride from dinner to hotel on 11/14 (E. Keil)	
Travel Expenses	30.99
Lyft ride from hotel to Atlanta airport on 11/15 (E. Keil)	
Travel Expenses	1,404.08
Hotel accommodation in Atlanta, GA for confirmation hearing on 11/11-11/15 (E. Keil)	
<b>Total Costs and Other Charges</b>	<b>\$24,932.93</b>

**EXHIBIT A-7**

**Time and Expense Detail**  
***December 1, 2024 – December 31, 2024***



Invoice: 3993215  
Client: 120098

02/28/25

LaVie Care Centers, LLC  
1040 Crown Pointe Parkway  
Atlanta, GA 30338

For Services Rendered in Connection with:

Matter: 0013 Chapter 11

Task	Date	Name	Hours	Description
B140	12/02/24	J. Haake	0.50	Research cases dealing with violation of the automatic stay and conference with M. Wombacher re same (.5).
B140	12/02/24	J. Haake	1.80	Correspondence and conference with E. Quinn re adjournment or withdrawal of motion to lift stay (.5); correspondence with F. Nason re same (.4); correspondence with P. Rubin re lift stay motion (.3); correspondence with E. Keil and T. Lynn re same (.3); correspondence with J. Rotstein re same (.3).
B140	12/03/24	J. Haake	1.10	Correspondence with L. Bonner re withdrawal of motion to lift stay (.3); conference with F. Nason re withdrawal of lift stay motions and status of case (.6); correspondence with J. Rotstein re lift stay issues (.2).
B140	12/04/24	J. Haake	0.50	Correspondence with lift stay movants re scheduling (.5).
B140	12/05/24	J. Haake	0.90	Correspondence with F. Lawall and counsel for lift stay motions re scheduling (.9).
B140	12/09/24	J. Haake	1.30	Correspondence with F. Lawall and counsel for lift stay motions re adjourning hearing (.6); correspondence with E. Quinn re hearing (.3); correspondence with F. Nason re notices to adjourn (.4).
B140	12/09/24	D. Simon	0.60	Review stay relief matters (.3); conference with J. Haake re same (.3).
B140	12/12/24	C. Lee	0.90	Conference with N. Bull and E. Keil re automatic stay extension (.5); conference and correspond with E. Keil, MWE team re same (.4).
B150	12/18/24	J. Haake	0.40	Conference with M. Robert, counsel for tort claimant, re unliquidated claims procedures (.4).



LaVie Care Centers, LLC

Client: 120098  
Invoice: 3993215  
Invoice Date: 02/28/25

Task	Date	Name	Hours	Description
B155	12/02/24	E. Keil	0.50	Draft notice of omnibus hearings (.3); correspondence with D. Northrop, A. Marchant-Lessa re same (.2).
B155	12/09/24	E. Keil	1.00	Draft agendas re 12.10.2024 hearing, adversary proceeding (.6); correspondence with D. Simon re same (.2); correspondence with D. Northrop re filing of same (.2).
B155	12/10/24	J. Haake	1.00	Correspondence with E. Quinn re hearing (.4); prepare for and participate in status hearing (.6).
B155	12/10/24	E. Keil	1.00	Prepare for and participate in omnibus hearing (1.0).
B155	12/18/24	J. Haims	2.00	Participate in hearing re IRS claim and correspondence re same (1.0); correspondence with MWE team re discovery, responses and strategy (1.0).
B155	12/18/24	E. Keil	0.80	Prepare for and participate in status conference re IRS (.8).
B155	12/18/24	D. Northrop	0.30	Prepare request for transcript of 12/18/2024 status hearing (.2); submit same via email to the transcription agency (.1).
B155	12/18/24	D. Simon	1.40	Prepare for and participate in court hearing (1.4).
B155	12/18/24	B. Tiemann	1.00	Participate in status hearing on IRS ERC claim (1.0).
B155	12/19/24	D. Northrop	0.30	Obtain transcript of 12/18/2024 status hearing re Debtors' objection to claim of the IRS (.1); review same (.1); correspondence with MWE team re same (.1).
B160	12/09/24	E. Keil	1.50	Revise Stout fee application (1.5).
B160	12/13/24	D. Northrop	0.80	Review filing-ready version of first and final fee application of Stout Capital, LLC, as investment banker to the Debtors and Debtors-in-Possession, and related notice (.2); conference and correspondence with E. Keil re revisions to same (.2); file first and final fee application of Stout Capital, LLC and related notice (.4).
B160	12/13/24	E. Keil	1.80	Revise and finalize Stout fee application (1.3); correspondence with M. Krakovsky re same (.3); correspondence with D. Northrop re filing of same (.2).
B160	12/18/24	E. Keil	0.30	Conference with M. Rosenbaum and correspondence re professional fees (.3).
B160	12/26/24	E. Keil	2.10	Review October time entries for privilege issues and





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LaVie Care Centers, LLC

Client: 120098  
Invoice: 3993215  
Invoice Date: 02/28/25

Task	Date	Name	Hours	Description
				compliance with local rules (2.1).
B185	12/02/24	E. Keil	1.10	Review Harts Harbor OTA (.8); correspondence with J. Watson, et al. re same (.3).
B185	12/03/24	E. Keil	1.20	Correspondence with LEAF re assignment (.3); review and revise same (.6); correspondence with J. Watson, G. Hayes re same (.3).
B185	12/04/24	E. Keil	0.60	Correspondence with LEAF counsel re cure amount (.6).
B185	12/06/24	E. Keil	0.30	Correspondence re Cigna with G. Hayes (.3).
B185	12/09/24	E. Keil	1.50	Draft correspondence re Cigna contracts (.8); review materials from G. Hayes re same (.5); correspondence with D. Simon re same (.2).
B185	12/30/24	E. Keil	0.60	Correspondence with G. Hayes re Cigna contracts (.3); review list of same (.2); correspondence with J. Wisler re same (.1).
B190	12/02/24	E. Keil	4.60	Revise 9019 motion (3.0); research re 505 motion (1.6).
B190	12/03/24	E. Keil	7.20	Revise 505 motion (3.8); conference with IRS re same (.5); conference with D. Simon, B. Tiemann re same (.4); revise 909 motion (2.5).
B190	12/03/24	B. Tiemann	0.80	Conference with W. Benson, H. Bilicki, B. Jones, V. Jones, E. Keil and D. Simon re letter on employee retention credit (.5); conference with E. Keil and D. Simon re next steps on same (.3).
B190	12/04/24	E. Keil	5.40	Revise 505 motion re ERTC liability (5.4).
B190	12/05/24	E. Keil	4.30	Revise 505 motion (3.9); conference with G. Hayes, Synergi, et al. re same (.4).
B190	12/05/24	B. Tiemann	1.00	Conference with G. Hayes, E. Keil, D. Simon, et al. re discovery requests (1.0).
B190	12/06/24	D. Simon	0.60	Conference with D. Thomas re open litigation matters (.6).
B190	12/07/24	E. Keil	1.50	Revise IRS claim motion (1.5).
B190	12/09/24	E. Keil	1.70	Research re IRS claims (1.3); conference with D. Simon re same (.4).
B190	12/10/24	E. Keil	5.40	Revise 9019 motion (.5); correspondence with J. Watson re same (.2); conference with B. Tiemann, D. Simon, et al. re ERTC motion (.3); revise same (4.1); conference with D. Simon re same (.2); correspondence with D. Northrop re filing of same (.1).



LaVie Care Centers, LLC

Client: 120098  
Invoice: 3993215  
Invoice Date: 02/28/25

Task	Date	Name	Hours	Description
B190	12/10/24	B. Tiemann	2.00	Review and revise 505 motion (1.5); correspondence with E. Keil and D. Simon re same (.1); conference with E. Keil and D. Simon re same (.4).
B190	12/11/24	E. Keil	0.60	Revise 9019 motion (.6).
B190	12/11/24	D. Simon	0.50	Review Brandon litigation matters (.5).
B190	12/12/24	D. Simon	2.00	Multiple conferences with team and D. Thomas re Brandon adversary matters, and analysis re same (1.4); review IRS discovery (.3); conference with E. Keil re same (.3).
B190	12/12/24	E. Keil	3.20	Conference with N. Bull, C. Lee re Brandon adversary proceeding (.5); conference with C. Lee re same (.3); review background materials re same (1.3); correspondence with D. Simon re same (.4); research and correspondence with D. Thomas re releases (.7).
B190	12/13/24	D. Simon	1.80	Multiple conferences re Brandon discovery matters (.8); conferences re IRS discovery matters (1.0).
B190	12/13/24	E. Keil	2.60	Revise and finalize 9019 motion (.8); correspondence with J. Watson, A. Matthews re same (.2); correspondence with D. Northrop re filing of same (.1); conference with Synergi re IRS discovery (.9); review same (.4); correspondence with Synergi, IRS re same (.2).
B190	12/13/24	B. Tiemann	2.30	Review discovery requests and identify types of documents responsive to requests (1.0); conference with G. Hayes, E. Keil, D. Simon, et al. re same (1.0); conference with J. Haims re next steps on same (.3).
B190	12/14/24	D. Simon	1.40	Multiple conferences re IRS discovery matters (1.4).
B190	12/14/24	B. Tiemann	2.50	Draft memo summarizing requirements of employee retention credit (2.3); correspondence with J. Haims and H. Udow re same (.2).
B190	12/16/24	E. Keil	2.50	Revise motion re extension of stay (1.3); correspondence and research re release issues (.9); correspondence with IRS, chambers re status conference for claim objection (.3).
B190	12/17/24	D. Simon	1.30	Conference with IRS re discovery and hearing (.6); multiple internal conferences re same (.7).
B190	12/17/24	E. Keil	3.10	Conference with IRS re discovery (.4); review discovery re same (.6); review and revise EEOC



LaVie Care Centers, LLC

Client: 120098  
Invoice: 3993215  
Invoice Date: 02/28/25

Task	Date	Name	Hours	Description
				agreement (.8); conference with B. Tiemann, D. Simon, et al. re IRS (.5); revise motion re Brandon adversary (.8).
B190	12/17/24	B. Tiemann	1.00	Conference with W. Benson, H. Bilicki, C. Burrell, V. Jones, E. Keil and D. Simon re discovery request (.5); conference with E. Keil, J. Haims, D. Simon and H. Udow re same (.5).
B190	12/18/24	E. Keil	2.80	Revise EEOC agreement (.7); correspondence with J. Watson re same (.3); research and correspondence re release issues (1.8).
B190	12/18/24	B. Tiemann	0.10	Correspondence with J. Haims and H. Udow re preparation of responses to requests for admission and interrogatories (.1).
B190	12/19/24	D. Simon	0.50	Conferences with Synergy re discovery matters (.5).
B190	12/19/24	E. Keil	3.80	Revise adversary complaint, motion, brief and declaration (3.8).
B190	12/19/24	D. Northrop	0.30	Attempt to upload proposed order for approval of mortgage settlement between Debtor Swan Pointe Facility Operations, LLC and E&D Rentals 4U LLC, pursuant to Bankruptcy Rule 9019 using the ECF order upload function (.2); communications with E. Keil re rejection of the proposed order by the ECF system and alternatives/work-arounds (.1).
B190	12/19/24	B. Tiemann	2.00	Draft responses to requests for admission and interrogatories (2.0).
B190	12/20/24	E. Keil	3.70	Revise adversary pleadings (3.7).
B190	12/20/24	D. Simon	1.50	Conferences with Synergy re ERC discovery matters (.5); communications with Synergi and B. Tiemann re same (.4); review issues relating to discovery and subpoena matters (.6).
B190	12/20/24	D. Northrop	0.20	Prepare to again attempt upload of proposed order for approval of mortgage settlement between Debtor Swan Pointe Facility Operations, LLC and E&D Rentals 4U LLC, pursuant to Bankruptcy Rule 9019 using the ECF order upload function (.1); communications with E. Keil re rejection of the proposed order by the ECF system waiting to upload the proposed order until the objection deadline has passed (.1).
B190	12/20/24	B. Tiemann	0.90	Conference with J. Stover re subpoena served on



LaVie Care Centers, LLC

Client: 120098  
Invoice: 3993215  
Invoice Date: 02/28/25

Task	Date	Name	Hours	Description
				Synergi and discovery request for Debtors (.7); conference and correspondence with D. Simon re same (.2).
B190	12/21/24	D. Simon	0.50	Internal communications re IRS discovery matters (.5).
B190	12/21/24	B. Tiemann	0.70	Draft summary of conference with J. Stover re subpoena served on Synergi and discovery request for Debtors (.6); correspondence with D. Simon re same (.1).
B190	12/22/24	D. Simon	1.80	Conference with DLA re corporate governance and liquidity matters (.9); analysis re D&O insurance matters and corporate governance initiatives (.9).
B190	12/23/24	E. Keil	6.60	Revise Brandon adversary complaint, brief, motion and declaration (5.3); conferences with G. Karch, D. Simon re tax structure (1.3).
B190	12/24/24	E. Keil	5.70	Revise brief and adversary complaint re Brandon (5.7).
B190	12/24/24	D. Simon	1.50	Review and revise Brandon adversary pleadings (1.5).
B190	12/24/24	B. Tiemann	1.50	Draft responses to requests for admission (1.5).
B190	12/25/24	E. Keil	3.20	Revise Brandon adversary pleadings (3.2).
B190	12/26/24	E. Keil	3.80	Correspondence with H. Udow, E. Kwon re IRS discovery (.4); review same (1.6); revise Brandon adversary pleadings (1.8).
B190	12/26/24	D. Simon	1.50	Review and revise Brandon adversary pleadings (1.5).
B190	12/26/24	B. Tiemann	4.00	Draft responses to requests for admission (1.5); correspondence with J. Haims and H. Udow re same (.3); review Synergi documents for discovery production (.8); draft responses to interrogatories (1.1); correspondence with E. Keil, J. Haims, D. Simon and H. Udow re same (.3).
B190	12/27/24	E. Keil	5.70	Conference with D. Simon, N. Bull, et al. re Brandon adversary (.5); conference with L. Halperin, B. Jones, et al. re same (.5); conference with D. Simon re same (.4); revise complaint, brief, motion re same (3.2); conference with J. Haims, D. Simon, et al. re IRS discovery update (.4); review responses re same (.7).
B190	12/27/24	D. Simon	2.80	Conferences and revise Brandon adversary



**McDermott  
Will & Emery**

LaVie Care Centers, LLC

Client: 120098  
Invoice: 3993215  
Invoice Date: 02/28/25

Task	Date	Name	Hours	Description
				pleadings (1.5); conferences with litigation team re IRS discovery (.7); review and revise discovery responses (.6).
B190	12/27/24	B. Tiemann	2.60	Review Synergi documents for discovery production and revise responses to interrogatories (2.0); conference with E. Keil, J. Haims, D. Simon and H. Udow re discovery production and responses to interrogatories (.5); correspondence with D. Simon re interrogatories requesting individuals with knowledge of information requested (.1).
B190	12/28/24	E. Keil	3.40	Revise Brandon adversary pleadings (3.4).
B190	12/28/24	B. Tiemann	3.00	Review Synergi's analysis of partial suspension of operations and related government orders required for eligibility for employee retention credit (3.0).
B190	12/29/24	E. Keil	4.60	Revise Brandon pleadings (4.6).
B190	12/30/24	E. Keil	5.30	Revise Brandon adversary brief (1.3); research re same (3.7); correspondence with KCC re declaration in support of same (.3).
B190	12/30/24	D. Simon	2.10	Revise Brandon adversary pleadings (1.3); communications re IRS discovery (.8).
B190	12/30/24	B. Tiemann	0.50	Review revised response to requests for admission (.4); correspondence with D. Simon re same (.1).
B190	12/31/24	E. Keil	6.20	Revise Brandon complaint, brief (3.5); draft declaration in support of same (1.7); correspondence with D. Thomas, J. Watson, et al. re same (.2); conference with D. Kovsky, F. Lawall re same (.5); correspondence with H. Bilicki re protective order (.3).
B190	12/31/24	D. Simon	1.30	Communications with J. Muenker re adversary and IRS discovery (.4); conference with Committee re same (.4); further review of adversary (.5).
B190	12/31/24	B. Tiemann	1.60	Correspondence with J. Haims and D. Simon re stipulation of facts (.1); draft stipulation of facts (1.5).
B210	12/03/24	J. Haake	1.20	Conference with D. Simon re vendor issues (.3); correspondence with S. Brazill re same (.4); conference with M. Zimmermann re transportation vendor issues (.5).
B210	12/20/24	D. Northrop	0.10	Review second 60-day patient care ombudsman report for the period of 9/12/24 through 11/12/24,



LaVie Care Centers, LLC

Client: 120098  
Invoice: 3993215  
Invoice Date: 02/28/25

Task	Date	Name	Hours	Description
				filed on 12/20/2024 by the Office of the Long-Term Care Ombudsman established within the North Carolina Division of Aging, and correspondence with MWE team re same (.1).
B210	12/26/24	E. Keil	0.30	Correspondence with B. Jones, B. Baron re tax payments (.3).
B220	12/11/24	E. Keil	0.40	Correspondence with G. Hayes re employee benefits (.4).
B230	12/09/24	D. Simon	0.40	Review DIP budget matters (.4).
B240	12/13/24	G. Karch	1.20	Review analysis of check the box election (.3); conference with J. Muenker, B. Baron, B. Jones and G. Hayes re same (.4); review restructuring transaction memo and correspondence with D. Simon re conference and tax implications (.5).
B240	12/17/24	G. Karch	1.70	Conference with J. Muenker, B. Baron, F. Mugabi, et al. re entity classification election under revised transaction structure (.9); analyze issues under revised structure (.8).
B240	12/23/24	G. Karch	1.80	Conference with E. Keil and M. Ghazi re details of likely asset transfer and liability settlement structure (.8); analyze tax implications and conference with D. Simon re same (1.0).
B240	12/23/24	M. Ghazi	1.00	Conference with MWE team re tax structural issues and analyze issues re same (1.0).
B240	12/26/24	M. Ghazi	0.80	Review structure chart and Form 8832 for tax issues, and review correspondence re same (.8).
B240	12/26/24	G. Karch	1.20	Conference with J. Muenker, F. Mugabi and D. Simon re entity classification election (.6); consider correct completion of election and conference with M. Ghazi (.6).
B240	12/27/24	G. Karch	0.50	Review Form 8832 entity classification election and confirm tax classification of relevant entities (.5).
B240	12/30/24	G. Karch	0.30	Review Form 8832 as proposed to be filed (.3).
B270	12/26/24	J. Haake	0.50	Correspondence with M. Caskey and J. Russell re utility deposits (.5).
B270	12/27/24	J. Haake	0.50	Correspondence with M. Caskey and J. Russell re utility deposits (.5).
B280	12/04/24	J. Haake	0.30	Correspondence with E. Keil and D. Simon re vendor issues (.3).
B280	12/12/24	E. Keil	0.30	Correspondence with A. Ballentine re Vista (.3).





LaVie Care Centers, LLC

Client: 120098  
Invoice: 3993215  
Invoice Date: 02/28/25

Task	Date	Name	Hours	Description
B280	12/13/24	E. Keil	0.20	Correspondence with A. Ballentine re Vista (.2).
B290	12/03/24	J. Haake	0.60	Conference with R. Blitz re insurance issues (.6).
B310	12/10/24	D. Northrop	0.90	Review filing-versions of Debtors' objection to Claim No. 5247 filed by the Internal Revenue Service and related notice of hearing (.2); communications with E. Keil re issues relating to file the Debtors' claim objection (.1); communications with E. Keil re suggested revision to notice of hearing for the Debtors' objection to IRS Claim No. 5247 (.1); file Debtors' objection to IRS Claim No. 5247 and related notice of hearing on the claim objection case docket (.5).
B310	12/17/24	D. Northrop	0.60	Review draft notice of virtual status conference re Debtors' objection to proof of claim no. 5247 filed by the IRS and draft agenda for 12/18/2024 status conference (.1); conference with E. Keil re proper ECF filing event for notice of virtual status conference (.1); file modified notice of virtual status conference (.2); file Debtors' agenda for the 12/18/2024 hearing (.2).
B310	12/31/24	J. Haake	0.60	Conference with F. Nason re late proof of claim (.6).
B320	12/02/24	E. Keil	1.40	Revise confirmation order (.5); conferences with R. Ahmed, D. Simon re same (.9).
B320	12/02/24	D. Simon	2.50	Multiple conferences to finalize confirmation order language and negotiations re same (1.7); communications with MWE, DLA re executory contract assumption (.4); communications with same re IRS issues (.4).
B320	12/03/24	E. Keil	0.60	Revise confirmation order (.4); correspondence with key constituents re same (.2).
B320	12/03/24	D. Simon	2.60	Multiple communications re plan confirmation language and related issues (1.6); conference with IRS re discovery issues (.6); conferences with E. Keil re plan matters (.4).
B320	12/04/24	E. Keil	3.60	Finalize confirmation order, plan, plan supplement and notices of same (3.6).
B320	12/04/24	D. Simon	1.20	Multiple conferences with E. Keil and B. Jones re IRS matters (1.2).
B320	12/04/24	D. Northrop	0.80	File notice of filing of further modifications to Debtors' modified second amended combined





LaVie Care Centers, LLC

Client: 120098  
Invoice: 3993215  
Invoice Date: 02/28/25

Task	Date	Name	Hours	Description
				disclosure statement and joint chapter 11 plan of reorganization (.2); file notice of filing of third amended plan supplement (.2); file notice of filing of revised confirmation order (.2); correspondence with E. Keil re issue relating to uploading of revised confirmation order (.1); update revised proposed confirmation order (.1).
B320	12/05/24	E. Keil	0.90	Revise confirmation order (.2); correspondence with A. Marchant-Lessa re same (.1); review confirmation order and opinion (.4); correspondence with client group re same (.2).
B320	12/05/24	D. Simon	1.20	Conference with Synergi re tax matters and potential discovery (.7); review confirmation opinion (.5).
B320	12/06/24	D. Simon	1.90	Conference with B. Jones re plan updates (.4); revise IRS motion (1.5).
B320	12/09/24	C. Lee	0.20	Conferences with contract counterparty re contract rejection (.2).
B320	12/10/24	D. Simon	3.00	Multiple conferences with Synergy and MWE re IRS matters and other plan matters (1.2); conference with J. Decker re same (.5); revise IRS motion (1.3).
B320	12/11/24	D. Simon	0.80	Review IRS materials and next steps (.8).
B320	12/12/24	D. Simon	0.90	Conference with J. Adams re modification of confirmation order (.2); multiple conferences with client and DIP lenders re same (.5); draft email to UST re same (.2).
B320	12/16/24	D. Simon	1.80	Conference with plan sponsor re plan and effective date matters (.5); conference with plan sponsor re tax and plan matters (.6); internal conferences re IRS discovery and hearing matters (.7).
B320	12/17/24	D. Simon	1.10	Conference with DLA re tax matters (.4); follow ups with client re same (.3); conference with client re plan issues (.4).
B320	12/17/24	E. Keil	0.70	Correspondence with D. Thomas, KCC re releases (.3); research re same (.4).
B320	12/20/24	D. Simon	0.30	Communications with tax attorneys re tax election (.3).
B320	12/23/24	D. Simon	1.30	Review and analysis of tax matters with G. Karch (.6); conference with plan sponsor re settlement of plan related matters (.7).
B320	12/26/24	D. Simon	0.70	Communications with G. Karch and J. Muenker re



LaVie Care Centers, LLC

Client: 120098  
Invoice: 3993215  
Invoice Date: 02/28/25

Task	Date	Name	Hours	Description
				tax matters (.7).
B470	12/05/24	T. Cramton	0.30	Review confirmation opinion (.3).
B470	12/12/24	H. Putre	0.50	Analyze correspondence and confer with N. Bull re onboarding, materials, background, arguments, and initial drafting of adversary complaint (.5).
B470	12/12/24	J. Haims	1.00	Review IRS claim documents and correspondence re IRS claim and objection, discovery and strategy (1.0).
B470	12/12/24	H. Putre	0.50	Conference with N. Bull and D. Simon re drafting adversary complaint (.2); review documents and confer with M. Khurana re same (.3).
B470	12/12/24	N. Bull	3.00	Multiple conferences with MWE team re Brandon litigation (2.0); review correspondence and pleadings (1.0).
B470	12/13/24	J. Haims	4.00	Review IRS claim documents and correspondence re IRS claim and objection, discovery and strategy (4.0).
B470	12/13/24	H. Putre	4.90	Draft Brandon adversary complaint, motion for a preliminary injunction or extension of stay, and brief in support of motion (4.9).
B470	12/13/24	H. Udow	0.80	Conference with J. Haims and C. Zhu re claim opposition and associated follow-up (.8).
B470	12/13/24	C. Zhu	2.50	Review documents relating to claim no. 5247 (1.5); participate in meetings to discuss discovery requests and summarize meeting notes re next steps (1.0).
B470	12/14/24	H. Putre	0.90	Draft brief in support of motion for injunction or extension of stay (.9).
B470	12/14/24	J. Haims	0.50	Correspondence with MWE team re IRS claim and objection, discovery and strategy (.5).
B470	12/15/24	J. Haims	0.70	Correspondence with MWE team re IRS claim and objection, discovery and strategy (.7).
B470	12/16/24	J. Haims	2.00	Review IRS claim documents and discovery requests, and correspondence with MWE team re IRS claim and objection, discovery and strategy (1.0); legal research re same (1.0).
B470	12/16/24	H. Putre	1.80	Draft and revise brief in support of motion for extension of stay re Brandon entities (1.8).
B470	12/16/24	C. Zhu	0.70	Review discovery requests and draft responses and objections (.7).
B470	12/17/24	J. Haims	2.50	Prepare for and participate in conference with DOJ



LaVie Care Centers, LLC

Client: 120098  
Invoice: 3993215  
Invoice Date: 02/28/25

Task	Date	Name	Hours	Description
				re IRS claim and correspondence re same, IRS claim and objection, discovery and strategy (1.5); legal research re same (.5); review discovery requests and correspondence with MWE team re responses (.5).
B470	12/17/24	H. Udow	1.90	Revise responses and objections to requests for production (1.4); conference with B. Tiemann, E. Keil, D. Simon, J. Haims re discovery requests (.5).
B470	12/17/24	C. Zhu	2.40	Review discovery requests and draft responses and objections (2.4).
B470	12/18/24	H. Udow	0.40	Draft interrogatory responses (.4).
B470	12/20/24	J. Haims	0.50	Correspondence with MWE team re IRS claim, discovery, responses and strategy (.5).
B470	12/20/24	C. Zhu	1.30	Draft responses and objections to interrogatories (1.3).
B470	12/21/24	J. Haims	0.50	Correspondence with MWE team re IRS claim, discovery and strategy (.5).
B470	12/23/24	J. Haims	1.50	Correspondence with MWE team re IRS claim, discovery, responses and strategy (.8); review protective order and correspondence re same (.7).
B470	12/24/24	J. Haims	1.50	Correspondence with MWE team re IRS claim, discovery, responses and strategy (1.0); legal research re same (.5).
B470	12/26/24	F. Belayneh	1.00	Ingest data for processing and populate custodian information in preparation to load into the review platform (.5); conduct QC on data processed to ensure file count is correct and all text and natives are present (.5).
B470	12/26/24	J. Haims	1.50	Work on IRS claim discovery responses and correspondence re same, document production and strategy (1.5).
B470	12/26/24	E. Kwon	0.20	Coordinate preparing ERC information for case development review in the discovery document repository (.2).
B470	12/26/24	A. Chatham	0.30	Review correspondence from D. Simon and others re potential adversary proceeding related to Brandon state court litigation (.3).
B470	12/26/24	H. Udow	2.00	Conference with J. Haims re responses to requests for admissions (.3); revise responses and objections to USA's requests for admission (1.7).
B470	12/27/24	J. Haims	1.30	Work on IRS claim discovery responses and



LaVie Care Centers, LLC

Client: 120098  
Invoice: 3993215  
Invoice Date: 02/28/25

Task	Date	Name	Hours	Description
				correspondence re same, document production and strategy (1.3).
B470	12/27/24	E. Kwon	0.80	Review ERC information documents in the discovery document repository for quality assurance (.5); prepare report of potentially relevant documents (.3).
B470	12/27/24	H. Udow	2.40	Draft responses and objections to requests for production (1.8); revise responses and objections to requests for admission (.6).
B470	12/27/24	N. Bull	2.50	Revise Brandon adversary papers (1.5); conferences with MWE team and sponsor counsel re same (1.0).
B470	12/30/24	J. Haims	2.00	Work on IRS claim discovery responses and correspondence re same, document production and strategy (2.0).
B470	12/30/24	E. Kwon	1.90	Prepare ERC documents for production (.4); review same for quality assurance (.3); identify documents related to cash flow and liquidity in the discovery document repository (.5); prepare report of same (.2); coordinate preparing new SYN-LAVIE production documents for case development review in the discovery document repository (.5).
B470	12/30/24	H. Udow	3.20	Revise responses and objections to requests for production (1.8); coordinate production of documents (1.1); draft production letter (.3).
B470	12/30/24	C. Zhu	0.80	Revise responses and objections to interrogatories (.8).
B470	12/31/24	F. Belayneh	0.50	Import production data and load into the review platform (.2); conduct QC on data to ensure file count is correct and all text, natives and images are present and all field populated appropriately (.3).
B470	12/31/24	J. Haims	0.70	Work on IRS claim discovery responses and correspondence re same, statement of undisputed facts, document production and strategy (.7).
B470	12/31/24	E. Kwon	0.20	Review new SYN-LAVIE documents in the discovery document repository for quality assurance (.2).
<b>Total Hours</b>			<b>274.90</b>	



LaVie Care Centers, LLC

Client: 120098  
Invoice: 3993215  
Invoice Date: 02/28/25

### Timekeeper Summary

Name	Hours	Rate	Amount
F. Belayneh	1.50	280.00	420.00
N. Bull	5.50	1,650.00	9,075.00
A. Chatham	0.30	1,525.00	457.50
T. Cramton	0.30	1,290.00	387.00
M. Ghazi	1.80	1,350.00	2,430.00
J. Haake	11.20	1,335.00	14,952.00
J. Haims	22.20	1,830.00	40,626.00
G. Karch	6.70	2,210.00	14,807.00
E. Keil	119.60	1,245.00	148,902.00
E. Kwon	3.10	570.00	1,767.00
C. Lee	1.10	1,155.00	1,270.50
D. Northrop	4.30	745.00	3,203.50
H. Putre	8.60	925.00	7,955.00
D. Simon	42.80	1,650.00	70,620.00
B. Tiemann	27.50	1,575.00	43,312.50
H. Udow	10.70	1,200.00	12,840.00
C. Zhu	7.70	1,040.00	8,008.00
<b>Totals</b>	<b>274.90</b>		<b>\$381,033.00</b>



LaVie Care Centers, LLC

Client: 120098  
 Invoice: 3993215  
 Invoice Date: 02/28/25

### Task Code Summary

Task Code	Description	Hours	Amount
B140	Relief from Stay/Adequate Protection Proceedings	7.60	10,173.00
B150	Mtgs/Communications w/Creditor	0.40	534.00
B155	Court Hearings	9.30	13,435.50
B160	Fee/Employment Applications	6.50	7,692.50
B185	Assumption/Rejection of Leases	5.30	6,598.50
B190	Other Contested Matters	145.00	197,565.50
B210	Business Operations	1.60	2,050.00
B220	Employee Benefits/Pensions	0.40	498.00
B230	Financing/Cash Collections	0.40	660.00
B240	Tax Issues	8.50	17,237.00
B270	Utilities	1.00	1,335.00
B280	Vendor Matters	0.80	1,023.00
B290	Insurance	0.60	801.00
B310	Claims Administration & Object	2.10	1,918.50
B320	Plan and Disclosure Statement	27.50	41,636.00
B470	Litigation	57.90	77,875.50
		274.90	381,033.00



LaVie Care Centers, LLC

Client: 120098  
Invoice: 3993215  
Invoice Date: 02/28/25

## Costs and Other Charges

Description	Amount
Computer Research	3,731.07
Computer Research	
Computer Usage Charge - Data Review & Production Software	6,056.00
"December monthly fee for Discovery Platform Use (RelativityOne, 566.45 GBs)"	
Document Services	138.70
VENDOR: eScribers LLC; INVOICE#: 1078105; DATE: 12/19/2024 - Obtain transcript of December 18, 2024 status hearing regarding Debtors' objection to IRS's proof of claim no. 5247 in In re LaVie Care Centers, LLC, et al., Case No. 24-55507 (PMB) (U.S. Bankruptcy Court for the Northern District of Georgia)	
Search Fees	108.96
VENDOR: Chapter 11 Dockets; INVOICE#: 139311; DATE: 12/13/2024 - November 2024 Usage	
<b>Total Costs and Other Charges</b>	<b>\$10,034.73</b>



**EXHIBIT A-8**

**Time and Expense Detail**  
***January 1, 2025 – January 31, 2025***



Invoice: 4002630  
Client: 120098

03/30/25

LaVie Care Centers, LLC  
1040 Crown Pointe Parkway  
Atlanta, GA 30338

For Services Rendered in Connection with:

Matter: 0013 Chapter 11

Task	Date	Name	Hours	Description
B110	01/23/25	J. Haake	0.40	Correspondence with E. Keil and D. Simon re case administration issues (.4).
B140	01/12/25	J. Haake	0.40	Review motion for entry of order approving relief from stay (.4).
B140	01/13/25	J. Haake	1.20	Review motion for entry of order approving relief from stay (.5); prepare for and participate in conference with counsel re stipulation (.7).
B140	01/14/25	J. Haake	0.40	Review revisions to stipulation to lift stay for transfer or licenses (.3); correspondence with E. Keil re same (.1).
B140	01/14/25	E. Keil	0.30	Correspondence with J. Haake re stipulation for stay relief (.3).
B140	01/15/25	J. Haake	0.30	Correspondence with R. Ahmed re license transfer issues (.3).
B140	01/16/25	J. Haake	0.20	Correspondence with E. Keil re stipulation and relief from stay order (.2).
B140	01/21/25	J. Haake	0.90	Correspondence with E. Keil re status of case (.1); correspondence with counsel to movants with pending relief stay motions re scheduling issues (.8).
B140	01/22/25	J. Haake	0.20	Correspondence with F. Nason and E. Rose re lift stay motions and scheduling (.2).
B140	01/23/25	J. Haake	1.30	Conference and correspondence with E. Keil re transfer of licenses and lift stay issues (.7); correspondence with E. Keil re license transfer issues (.1); correspondence with G. Hayes and J. Watson re same (.2); correspondence with P. Rubin re lift stay and scheduling issues (.3).
B140	01/24/25	J. Haake	0.50	Conference with E. Quinn re 2/4/2025 hearing (.5).
B140	01/27/25	J. Haake	0.90	Conferences and correspondence with F. Nason re late filed claim and lift stay motions (.3); correspondence with P. Rubin re notice of



LaVie Care Centers, LLC

Client: 120098  
Invoice: 4002630  
Invoice Date: 03/30/25

Task	Date	Name	Hours	Description
				withdrawal (.2); correspondence with E. Quinn re continuance (.3); correspondence with F. Lawall re lift stay hearings (.1).
B140	01/30/25	J. Haake	0.60	Correspondence and conferences with E. Quinn re lift stay and hearing issues related to lift stay motion (.6).
B140	01/31/25	J. Haake	0.40	Conference with E. Quinn re continuance of 2/4/2025 hearing (.4).
B150	01/30/25	J. Haake	0.30	Conference with tort claimant re claims procedures and status of case (.3).
B155	01/16/25	D. Northrop	2.50	Draft and prepare pro hac vice motions (using the court's form) and proposed orders for J. Haims and B. Tiemann (1.2); multiple correspondence with J. Haims and B. Tiemann re preparation and execution of pro hac vice motions (.3); arrange for check to be cut to pay pro hac vice admission fee for J. Haims and B. Tiemann (.2); coordinate preparations for delivery of the pro hac vice fee payment to the U.S. District Court and the pro hac vice motions for J. Haims and B. Tiemann to the U.S. Bankruptcy Court for filing on 1/17/2025 (.8).
B155	01/17/25	E. Keil	1.00	Participate in status conference re IRS discovery dispute (1.0).
B155	01/17/25	D. Simon	3.40	Prepare for and participate in discovery conference (3.4).
B155	01/17/25	J. Haims	1.50	Participate in telephonic court hearing and correspondence re same and strategy (1.5).
B155	01/21/25	E. Keil	0.60	Correspondence with A. Marchant-Lessa re omnibus hearings (.2); draft notice of omnibus hearings re same (.3); correspondence with D. Northrop re filing of same (.1).
B155	01/22/25	E. Keil	0.20	Participate in omnibus hearing (.1); correspondence with A. Marchant-Lessa re notice of additional omnibus hearings (.1).
B155	01/30/25	E. Keil	0.60	Prepare for and participate in status conference re 9019 motion and motion for expedited hearing (.6).
B155	01/30/25	D. Simon	1.50	Prepare for and participate in status conference (1.5).
B155	01/31/25	E. Keil	0.50	Draft 2/4/2025 hearing agenda and witness list (.5).
B160	01/03/25	E. Keil	0.70	Revise October fee statement (.3); draft Ankura



LaVie Care Centers, LLC

Client: 120098  
Invoice: 4002630  
Invoice Date: 03/30/25

Task	Date	Name	Hours	Description
				reports (.4).
B160	01/07/25	E. Keil	0.80	Revise Ankura quarterly report (.5); draft OCP quarterly statement (.3).
B160	01/08/25	E. Keil	0.70	Correspondence with M. Krakovsky re Stout fee application (.1); correspondence with A. Marchant-Lessa re order for same (.1); correspondence with J. Brilliant, R. Ahmed re Ankura reports (.1); revise same (.3); correspondence with same re OCP summary (.1).
B160	01/10/25	E. Keil	0.20	Revise October fee statement (.2).
B160	01/21/25	E. Keil	0.30	Finalize Ankura staffing report (.2); correspondence with D. Northrop re filing (.1).
B160	01/22/25	E. Keil	0.40	Finalize Ankura quarterly report (.2); correspondence with D. Northrop re same (.2).
B160	01/30/25	E. Keil	1.40	Review invoice for privilege issues and compliance with local rules (1.4).
B160	01/31/25	E. Keil	0.50	Draft notice of third OCP statement (.4); correspondence with D. Northrop, D. Simon re filing of same (.1).
B160	01/31/25	D. Northrop	0.20	File notice of quarterly statement of amounts paid to OCPs for the period 10/1/2024 through 12/31/2024 (.2).
B185	01/08/25	C. Lee	0.10	Conference with counsel to executory contract counterparty re payment, cure (.1).
B185	01/08/25	E. Keil	0.40	Correspondence with G. Hayes, J. Wisler re Cigna contracts (.4).
B185	01/09/25	E. Keil	0.20	Correspondence with J. Muenker, J. Wisler re Cigna contracts (.2).
B185	01/10/25	E. Keil	0.70	Conference with J. Muenker re Cigna (.4); correspondence with J. Wisler re same (.3).
B185	01/13/25	E. Keil	0.20	Correspondence with J. Wisler, J. Muenker re Cigna (.2).
B185	01/15/25	C. Lee	0.10	Correspond with E. Keil, contract counterparty re executory contracts (.1).
B185	01/31/25	E. Keil	0.40	Conference with K. Furr re Harts Harbor lease rejection (.4).
B190	01/02/25	J. Haims	2.50	Revise IRS claim discovery responses and correspondence with MWE team re same, document production, hearing preparations, and strategy (2.5).
B190	01/02/25	H. Udow	1.20	Conference with J. Haims re interrogatory responses



LaVie Care Centers, LLC

Client: 120098  
Invoice: 4002630  
Invoice Date: 03/30/25

Task	Date	Name	Hours	Description
B190	01/02/25	E. Keil	4.50	(.4); revise interrogatory responses (.8). Correspondence with H. Udow, J. Haims, et al. re IRS discovery (.4); review same (1.3); revise interrogatories re same (.6); correspondence with D. Kovsky, F. Lawall re Brandon (.6); revise brief re same (1.6).
B190	01/02/25	D. Simon	2.00	Review IRS discovery materials and communications with MWE team re same (2.0).
B190	01/02/25	B. Tiemann	3.00	Continue drafting stipulation of facts (2.5); review responses and objections to interrogatories (.5).
B190	01/03/25	F. Belayneh	0.50	Ingest data for processing and populate custodian information in preparation to load into the review platform (.2); conduct QC on data processed to ensure file count is correct and all text and natives are present (.3).
B190	01/03/25	J. Haims	3.00	Revise IRS claim discovery responses and correspondence with MWE team re same, document production, hearing preparations, and strategy (1.5); review draft stipulation of facts and correspondence re same (.7); research re same (.8).
B190	01/03/25	A. Schiller	2.30	Prepare for case development review of client documents (.5); create client document production (1.0); review same for quality assurance (.4); prepare deliverable of same (.4).
B190	01/03/25	H. Udow	1.20	Revise responses to interrogatories (.8); review documents for production (.4).
B190	01/03/25	E. Keil	3.60	Revise interrogatory responses (1.1); correspondence with B. Jones re same (.2); conference with Synergi re discovery (.5); revise Brandon adversary pleadings (1.5); conference with D. Simon re same (.3).
B190	01/03/25	D. Simon	3.00	Review IRS discovery matters (1.2); conference with Synergi re same (.6); review Brandon litigation and related pleadings (1.2).
B190	01/03/25	B. Tiemann	2.10	Continue reviewing responses and objections to interrogatories (.4); continue drafting stipulation of facts (1.0); correspondence with J. Haims and H. Udow re same (.2); conference with E. Keil, J. Muenker, D. Simon, et al. re discovery (.5).
B190	01/04/25	J. Haims	0.50	Correspondence with MWE team re IRS claim



LaVie Care Centers, LLC

Client: 120098  
Invoice: 4002630  
Invoice Date: 03/30/25

Task	Date	Name	Hours	Description
				discovery responses, document production, hearing preparations, and strategy (.5).
B190	01/06/25	J. Haims	2.00	Revise IRS claim discovery responses and correspondence with MWE team re same, document production, hearing preparations, and strategy (1.0); review draft stipulation of facts and correspondence re same (1.0).
B190	01/06/25	H. Udow	1.30	Coordinate document production and draft production letter (1.2).
B190	01/06/25	D. Simon	2.50	Conference with DIP Lenders re Brandon litigation (.5); finalize adversary papers (.4); numerous conferences and communications re IRS litigation matters (1.6).
B190	01/06/25	D. Northrop	2.30	Review draft adversary complaint against CREA Brandon-C LLC and Brandon Health OpCo, LLC, motion for order extending automatic stay and preliminarily enjoining claims against non-Debtor defendants, brief in support of stay extension motion, and declaration in support of stay extension motion (.3); correspondence with E. Keil re proposed revisions to complaint and declaration in support of stay extension motion (.2); open adversary proceeding through ECF (.4); file complaint, stay extension motion, brief in support of stay extension motion, and declaration in support of stay extension motion in Adv. Pro. 25-5007 (1.4).
B190	01/06/25	E. Keil	5.50	Conference with D. Simon, B. Tiemann, et al. re IRS issues (.3); revise Brandon adversary pleadings (3.9); conference with J. Muenker, D. Simon re same (.7); coordinate service and filing of same (.6).
B190	01/06/25	B. Tiemann	0.50	Conference with E. Keil, J. Haims, D. Simon and H. Udow re trial preparation (.5).
B190	01/07/25	J. Haims	1.00	Work on IRS claim hearing prep and correspondence with MWE team re same, document production, and strategy (1.0).
B190	01/07/25	D. Simon	2.90	Multiple conferences and communications re IRS issues and related discovery (1.6); conferences with Synergy and others re hearing prep (1.0); conference with D. Thomas re adversary matters (.3).
B190	01/07/25	E. Keil	0.90	Correspondence with counsel to the Brandon entities



LaVie Care Centers, LLC

Client: 120098  
Invoice: 4002630  
Invoice Date: 03/30/25

Task	Date	Name	Hours	Description
				(.3); correspondence with MWE team re IRS issues (.3); correspondence with chambers, J. Watson re proposed orders for 9019 motion (.3).
B190	01/07/25	B. Tiemann	5.00	Continue reviewing government orders in Florida, Georgia and North Carolina and draft related stipulations of fact (5.0).
B190	01/08/25	J. Haims	2.00	Work on IRS claim hearing prep and correspondence with MWE team re same, document production, and strategy (2.0).
B190	01/08/25	A. Schiller	0.50	Decrypt client spreadsheet files on behalf of US DOJ (.5).
B190	01/08/25	H. Udow	0.80	Conference with MWE team re stipulation of facts and strategy (.8).
B190	01/08/25	E. Keil	5.60	Draft agreed order re Brandon adversary (.5); correspondence with M. Bittman re same (.2); conference with B. Tiemann re IRS claim (.3); conference with D. Simon, B. Tiemann, J. Haims re same (.7); research re [REDACTED] (3.0); draft correspondence with D. Simon, et al. re same (.6); correspondence with D. Northrop, A. Marchant-Lessa re proposed orders re 9019 motion (.3).
B190	01/08/25	D. Simon	4.50	Numerous conferences and communications re IRS hearing matters, depositions and discovery (2.5); review materials in connection with same (2.0).
B190	01/08/25	B. Tiemann	3.50	Conference with E. Keil re analysis eligibility and calculation of employee retention credit (.8); correspondence with E. Keil re research on same (.2); conference with E. Keil, J. Haims, D. Simon and H. Udow re depositions (.5); continue drafting stipulations of fact (2.0).
B190	01/09/25	J. Haims	1.50	Work on IRS claim hearing prep and correspondence with MWE team re same, document production, Synergi subpoenas, protective order, and strategy (1.5).
B190	01/09/25	A. Schiller	1.70	Prepare for case development review of client tax return documents (.5); conduct case development review of Synergi document production set (1.0); provide case team report of same set (.2).
B190	01/09/25	A. Garcia	1.00	Ingest data for processing and populate custodian





LaVie Care Centers, LLC

Client: 120098  
Invoice: 4002630  
Invoice Date: 03/30/25

Task	Date	Name	Hours	Description
				information in preparation to load into review platform (.2); monitor status to ensure deadline compliance and troubleshoot processing exception (.2); integrate data selected for review into review platform (.2); build incremental dtSearch index and run search term report (.2); conduct QC on data processed to ensure file count is correct and all natives and texts are present (.2).
B190	01/09/25	D. Simon	4.50	Numerous conferences and communications with Synergi, Synergy and internal MWE team re IRS hearing prep matters (3.0); review and analysis re same (1.5).
B190	01/09/25	E. Keil	5.70	Research re IRS matters (3.1); conference with Synergi re same (.5); revise reply brief re same (1.4); correspondence with H. Udow re IRS discovery (.3); review same (.4).
B190	01/09/25	B. Tiemann	2.70	Continue drafting stipulations of fact (2.0); correspondence with E. Keil, J. Haims, D. Simon and H. Udow re same (.2); conference with E. Keil, J. Muenker, D. Simon, et al. re trial preparation (.5).
B190	01/10/25	J. Haims	3.00	Correspondence with MWE team re IRS claim hearing prep, discovery, Synergi subpoenas, protective order, and strategy (.5); review, revise, and research draft stipulation of facts and correspondence re same and strategy (1.5); conference and correspondence with DOJ re same and strategy (1.0).
B190	01/10/25	A. Schiller	0.20	Finalize delivery of decrypted production documents (.2).
B190	01/10/25	H. Udow	1.00	Conference with IRS re discovery (.7); debrief with MWE team (.3).
B190	01/10/25	D. Simon	4.40	Numerous conferences and communications with respect to IRS dispute, and analysis re same (4.4).
B190	01/10/25	E. Keil	5.20	Conference with IRS, MWE re discovery (.8); conference with B. Tiemann re same (.5); revise brief re same (3.4); draft notice of dismissal re Recovery Corp. adversary (.5).
B190	01/10/25	B. Tiemann	1.00	Conference with W. Benson, H. Bilicki, C. Burell, V. Jones, E. Keil, et al. re discovery (.5); conference with J. Haims re stipulations of fact (.5).



LaVie Care Centers, LLC

Client: 120098  
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Invoice Date: 03/30/25

Task	Date	Name	Hours	Description
B190	01/11/25	J. Haims	1.00	Prepare for IRS claim hearing and correspondence re same, depositions, and strategy (1.0).
B190	01/11/25	E. Keil	4.60	Revise reply brief re IRS claim objection (4.6).
B190	01/11/25	D. Simon	1.30	Multiple communications re IRS discovery and next steps (1.3).
B190	01/12/25	J. Haims	1.00	Prepare for IRS claim hearing and depositions (1.0).
B190	01/12/25	B. Tiemann	2.00	Draft lists of questions for Synergi and Synergy re employee retention credit analysis (2.0).
B190	01/13/25	J. Haims	3.50	Correspondence with MWE team re IRS claim hearing prep, settlement negotiations, discovery, Synergi and Synergy subpoenas, and strategy (2.0); prepare for depositions and correspondence with MWE team re same (1.5).
B190	01/13/25	E. Kwon	1.00	Prepare tax return documents for production (.4); prepare unencrypted documents for re-production (.6).
B190	01/13/25	D. Simon	5.00	Numerous conferences and communications with IRS re settlement and litigation (1.3); multiple conferences with client, Synergy, and others re same (1.8); review and revise stipulation of facts (.4); multiple communications internally re litigation strategy matters (1.5).
B190	01/13/25	E. Keil	8.70	Conferences with D. Simon, J. Haims, et al. re IRS claim objection briefing and discovery (.7); draft responses re IRS discovery (1.3); review Synergi discovery production (2.4); revise supplemental brief re IRS claim (3.7); revise notice of dismissal re Recovery Corp. adversary proceeding and prepare for filing (.4); correspondence with J. Anthony, D. Northrop, A. Marchant-Lessa re same (.2).
B190	01/13/25	D. Northrop	0.60	Review draft of joint notice of dismissal of Adv. Pro. No. 24-5127 (.1); correspondence with E. Keil re revisions to certificate of service for the joint notice of dismissal (.2); file joint notice of dismissal of Adv. Pro. No. 24-5127 (.3).
B190	01/13/25	B. Tiemann	2.90	Correspondence with D. Simon re Synergi work task study (.2); review letter to IRS (.5); correspondence with D. Simon re same (.2); continue drafting stipulations of fact (2.0).
B190	01/14/25	J. Haims	6.00	Correspondence with MWE team re IRS claim



LaVie Care Centers, LLC

Client: 120098  
Invoice: 4002630  
Invoice Date: 03/30/25

Task	Date	Name	Hours	Description
				hearing prep, settlement negotiations, discovery, Synergi and Synergy subpoenas, and strategy (3.0); prepare for deposition prep meeting and correspondence re same and strategy (1.0); review, revise and research draft stipulation of facts and correspondence re same (2.0).
B190	01/14/25	T. Cramton	0.50	Conference with D. Simon re tax litigation issue (.5).
B190	01/14/25	H. Udow	2.70	Conduct research re [REDACTED] (2.1); conference with MWE team re stipulation of facts (.6).
B190	01/14/25	E. Keil	10.60	Revise stipulation of facts (6.9); research re same (2.3); conferences with D. Simon, J. Haims re same (.9); analyze release issue (.3); conference with V. Jones re IRS non-ERC claims (.2).
B190	01/14/25	D. Simon	4.60	Review and revise stipulation of facts (.6); numerous conferences and communications with IRS, internal and Synergy re depositions and discovery matters (4.0).
B190	01/14/25	B. Tiemann	2.40	Continue drafting stipulations of fact (1.5); correspondence with J. Haims and H. Udow re same (.2); conference with D. Simon (.2); conference with J. Haims, E. Keil, D. Simon and H. Udow (.5).
B190	01/15/25	J. Haims	10.00	Correspondence with MWE team re IRS claim hearing prep, depositions, document production, IRS request for emergency teleconference with the court, and strategy (5.0); review, revise and research draft stipulation of facts and correspondence re same (2.0); legal research re same (1.0); conference with DOJ and correspondence with same re same (1.0); prepare for depositions (1.0).
B190	01/15/25	T. Cramton	2.10	Conferences with D. Simon and J. Haims on case updates and IRS issue (.5); review initial background emails and filings from D. Simon on IRS issue (.5); participate in team strategy conference re IRS deposition request and upcoming conference with court (1.1).
B190	01/15/25	A. Garcia	1.00	Ingest data for processing and populate custodian information in preparation to load into review platform (.2); monitor status to ensure deadline



LaVie Care Centers, LLC

Client: 120098  
Invoice: 4002630  
Invoice Date: 03/30/25

Task	Date	Name	Hours	Description
				compliance and troubleshoot processing exception (.2); integrate data selected for review into review platform (.2); build incremental dtSearch index and run search term report (.2); conduct QC on data processed to ensure file count is correct and all natives and texts are present (.2).
B190	01/15/25	A. Schiller	2.10	Prepare for case development review multiple sets of client documents (2.1).
B190	01/15/25	H. Udow	3.60	Conduct research re [REDACTED] (1.6); conference with IRS re depositions (.5); identify and prepare documents for J. Pyron deposition preparation (1.5).
B190	01/15/25	E. Keil	11.40	Revise draft stipulation of facts (3.6); conferences and correspondence with J. Haims, D. Simon re same (2.1); conference with Synergi re same (.7); compile documents for B. Jones review re same (1.1); conference with H. Bilicki, C. Burrell, et al. re IRS discovery (.5); conference with MWE team re same (.5); review and compile governmental orders (2.5); correspondence with discovery team re same (.4).
B190	01/15/25	D. Simon	8.30	Numerous conferences and communications with IRS, internal and Synergy re open discovery, depositions, and trial prep matters (6.8); review IRS letter and strategy conference re same (1.5).
B190	01/15/25	B. Tiemann	2.40	Conference with D. Dias, J. Haims, E. Keil, J. Muenker and D. Simon re discovery (1.0); conference with W. Benson, C. Burrell, H. Bilicki, et al. re discovery (.5); conference with J. Haims (.2); conference with D. Simon (.2); conference with A. Hogsette, J. Haims, E. Keil, D. Simon and J. Stover re discovery (.5).
B190	01/16/25	H. Udow	4.60	Review Synergi production for government orders and guidance (3.1); conference with MWE team re response to discovery dispute letter (.5); conference with T. Cramton, J. Haims, E. Keil, B. Tiemann re 30(b)(6) deposition preparation (1.0).
B190	01/16/25	D. Simon	9.30	Numerous communications and correspondence with Synergy, Debtors and others re discovery dispute (3.3); draft and revise court submission re



LaVie Care Centers, LLC

Client: 120098  
Invoice: 4002630  
Invoice Date: 03/30/25

Task	Date	Name	Hours	Description
				same (2.2); review production matters (.8); prepare for depositions and trial (3.0).
B190	01/16/25	B. Tiemann	3.00	Complete pro hac vice application (.7); correspondence with D. Northrop re same (.3); conference with D. Simon (.5); conference with T. Cramton, J. Haims, E. Keil and D. Simon re discovery (.5); conference with T. Cramton, J. Haims, E. Keil, D. Simon and H. Udow re deposition preparation for B. Jones (1.0).
B190	01/16/25	C. Lee	0.90	Correspond with E. Keil re governmental orders (.1); research and compile same (.8).
B190	01/16/25	J. Haims	9.00	Correspondence with MWE team re IRS claim hearing prep, depositions, document production, requests for emergency court conference, and strategy (5.0); legal research re same (.5); prepare for depositions and B. Jones prep (3.0); review and revise draft letter to court re ERC settlement (.5).
B190	01/16/25	T. Cramton	8.80	Multiple conferences with MWE team re IRS tax issues, depositions, upcoming conference, and legal issues and arguments (5.5); review and analyze IRS legal arguments and authority, including related legal research and drafting response, plus follow-up and conference re same (2.3); related deposition preparation (1.0).
B190	01/16/25	D. Valentino	0.80	Process data, resolve technical issues and promote documents for attorney review (.3); conduct final QC ensuring natives, text and metadata present (.3); update search index and search term reports (.2).
B190	01/16/25	A. Schiller	1.20	Create three sets of production documents (1.0); finalize delivery of same sets (.2).
B190	01/16/25	E. Keil	12.50	Draft letter to court re IRS discovery dispute (3.6); conferences with D. Simon, J. Haims, T. Cramton re same (1.8); research re brief in support of claim objection (1.9); draft declarations in support of same (2.7); revise brief re same (2.3); draft electronic equipment motion (.2).
B190	01/17/25	J. Haims	6.50	Participate in Synergi depositions and correspondence re same and strategy (5.5); correspondence with MWE team re hearing prep, depositions, document review and production, and



LaVie Care Centers, LLC

Client: 120098  
Invoice: 4002630  
Invoice Date: 03/30/25

Task	Date	Name	Hours	Description
B190	01/17/25	T. Cramton	10.50	strategy (1.0). Defend J. Pyron (Synergy) deposition, including prep, internal conference, and debriefing (6.0); participate in court conference re discovery dispute and hearing (1.0); attend Synergi 30(b)(6) deposition (2.3); review and analyze Pyron rough transcript and IRS response filing (1.2).
B190	01/17/25	D. Valentino	0.80	Process data, resolve technical issues and promote documents for attorney review (.3); conduct final QC ensuring natives, text and metadata present (.3); update search index and search term reports (.2).
B190	01/17/25	A. Schiller	1.40	Prepare for case development review of client documents (.7); provide case team PDFs of production documents for review (.7).
B190	01/17/25	E. Keil	7.50	Attend Synergi deposition (6.7); conferences with J. Haims, B. Tiemann re same (.8).
B190	01/17/25	H. Udow	3.10	Participate in court conference re discovery dispute (1.0); review Synergi production for government orders/guidance (2.1).
B190	01/17/25	D. Simon	5.90	Participate in portions of Pyron and Synergi depositions (2.3); numerous communications re same (1.2); negotiations with IRS and others re discovery and adjournment matters (2.4).
B190	01/17/25	B. Tiemann	9.30	Participate in depositions of Synergi employees (7.5); participate in court hearing on discovery issues (1.0); conference with E. Keil re same (.8).
B190	01/18/25	J. Haims	1.00	Correspondence with MWE team re hearing prep, depositions, document review and production, and strategy (1.0).
B190	01/18/25	E. Keil	1.60	Review IRS response (1.3); correspondence with MWE team re same (.3).
B190	01/18/25	D. Simon	2.10	Multiple conferences and review documents in connection with depositions and discovery (1.3); numerous communications re settlement conference and next steps (.8).
B190	01/19/25	J. Haims	2.50	Correspondence with MWE team re hearing prep, depositions, document review and production, and strategy (2.5).
B190	01/19/25	T. Cramton	1.90	Review and analyze IRS response (.9); conference with MWE team re case strategy post depositions





LaVie Care Centers, LLC

Client: 120098  
Invoice: 4002630  
Invoice Date: 03/30/25

Task	Date	Name	Hours	Description
B190	01/19/25	E. Keil	2.00	(1.0). Conference with J. Haims, D. Simon, B. Tiemann, et al. re IRS response and next steps (1.1); review response re same (.9).
B190	01/20/25	J. Haims	1.50	Correspondence with MWE team re hearing prep, depositions, document review and production, and strategy (1.5).
B190	01/20/25	T. Cramton	2.50	Conferences and correspondence with D. Simon and J. Haims on IRS issues, depositions, evidentiary issues, and legal research (1.5); correspondence with MWE team and IRS counsel re same (.5); legal research on [REDACTED] (.5).
B190	01/20/25	H. Udow	4.40	Conduct research re [REDACTED] (4.4).
B190	01/20/25	D. Simon	2.40	Multiple communications with IRS, Synergy and others re discovery and settlement matters (1.6); review trial prep matters (.8).
B190	01/21/25	J. Haims	3.00	Correspondence with MWE team re hearing prep, depositions, document review and production, and strategy (2.0); legal research re same (.5); review amended Debtor deposition notice and correspondence re same (.5).
B190	01/21/25	T. Cramton	3.10	Conferences and correspondence with MWE team re IRS issue and upcoming hearing, depositions, and deposition prep (2.0); update 30(b)(6) responses for B. Jones deposition prep per updated subpoena (1.1).
B190	01/21/25	H. Udow	1.30	Draft amended responses and objections to interrogatories (1.3).
B190	01/21/25	D. Simon	8.00	Review and discuss Synergy production (1.4); numerous conferences with plan sponsor and others re settlement matters (1.2); deposition prep (1.8); numerous communications re trial prep matters (1.7); review and revise Brandon stipulations (.4); review case law re burdens and related issues (1.5).
B190	01/21/25	E. Keil	7.70	Correspondence with Verita re Brandon requests (.2); correspondence with B. Taylor re same (.2); revise draft declarations re IRS matter (3.6); revise stipulation of facts re same (1.2); research re [REDACTED] (2.5).





LaVie Care Centers, LLC

Client: 120098  
Invoice: 4002630  
Invoice Date: 03/30/25

Task	Date	Name	Hours	Description
B190	01/22/25	J. Haims	5.00	Correspondence with MWE team re hearing prep, depositions, document review and production, and strategy (1.0); prepare for and participate in deposition prep meeting with B. Jones (3.0); conference with Synergi counsel and correspondence re same (.3); conference with IRS and correspondence re same (.7).
B190	01/22/25	T. Cramton	3.10	Review and update 30(b)(6) responses (.5); conduct B. Jones initial deposition prep session (1.1); follow up correspondence and conference on case strategy, deposition prep, document productions and trial with MWE team (1.2); review D. Simon final offer letter (.3).
B190	01/22/25	A. Schiller	2.40	Prepare for case development review of client documents (.5); create LaVie document production (1.1); ensure redacted or privileged documents are properly produced (.5); prepare deliverable of same (.3).
B190	01/22/25	H. Udow	3.20	Revise responses and objections to interrogatories (2.3); review documents provided by Synergy (.9).
B190	01/22/25	E. Keil	6.30	Review IRS response (1.2); conference with Synergi re same (.3); research re [REDACTED] (4.5);
B190	01/22/25	D. Simon	8.80	correspondence with B. Taylor re Brandon (.3). Prepare for and participate in settlement conference with DOJ (1.5); numerous conferences re settlement (1.5); draft and revise settlement letter (.8); numerous conferences and review discovery matters and trial prep issues (5.0).
B190	01/22/25	B. Tiemann	1.50	Research [REDACTED] (1.2); correspondence with D. Simon re same (.2); conference with D. Simon (.1).
B190	01/23/25	J. Haims	1.50	Review and revise drafts of letter to DOJ and correspondence re same, hearing preparations, depositions, document, production, and strategy (1.5).
B190	01/23/25	T. Cramton	2.10	Review updated draft letter to IRS re final settlement, including correspondence with MWE team and conference with D. Simon re same (.7);



LaVie Care Centers, LLC

Client: 120098  
Invoice: 4002630  
Invoice Date: 03/30/25

Task	Date	Name	Hours	Description
B190	01/23/25	A. Schiller	4.40	review draft Synergi declaration and revert with comments (.5); correspondence with MWE team re amended interrogatory responses and productions (.5); conference with MWE team re trial prep (.4). Make available to case team for case development review latest document production set (1.0); create LaVie document production (1.8); ensure redacted or privileged documents are properly produced (.8); prepare deliverable of same (.3); finalize delivery of LaVie document production (.5).
B190	01/23/25	E. Keil	10.00	Revise settlement letter (2.4); correspondence and conferences with D. Simon, J. Haims, et al. re same (1.2); revise reply brief and research re case law in support of same (6.4).
B190	01/23/25	H. Udow	1.80	Revise amended responses to interrogatories (.9); review email production received from Synergy (.9).
B190	01/23/25	D. Simon	7.00	Numerous revisions and communications re settlement letter (2.7); participate in deposition prep session (1.5); numerous conferences and review hearing preparation matters (1.8); conferences re discovery and document production (1.0).
B190	01/23/25	B. Tiemann	4.00	Review and revise settlement agreement (1.3); correspondence with E. Keil and H. Udow re state orders for partial suspension analysis (.2); draft slides on overview of employee retention credit (2.5).
B190	01/24/25	J. Haims	0.50	Correspondence with MWE team re discovery, hearing and deposition prep, and strategy (.5).
B190	01/24/25	A. Schiller	2.50	Prepare for case development review of client document, and document production sets (2.5).
B190	01/24/25	B. Tiemann	4.50	Continue drafting slides on overview of employee retention credit (2.0); conference with T. Cramton, J. Haims, B. Jones, E. Keil, R. Perry and B. Simon re deposition preparation (2.0); conference with T. Cramton, E. Keil, D. Simon and H. Udow re trial preparation (.5).
B190	01/24/25	J. Haake	1.00	Conference with D. Simon re strategy on IRS dispute (.3); begin drafting 9019 motion (.7).
B190	01/24/25	A. Garcia	1.00	Ingest data for processing and populate custodian information in preparation to load into review



LaVie Care Centers, LLC

Client: 120098  
Invoice: 4002630  
Invoice Date: 03/30/25

Task	Date	Name	Hours	Description
				platform (.2); monitor status to ensure deadline compliance and troubleshoot processing exception (.2); integrate data selected for review into review platform (.2); build incremental dtSearch index and run search term report (.2); conduct QC on data processed to ensure file count is correct and all natives and texts are present (.2).
B190	01/24/25	T. Cramton	5.00	Conduct ERC deposition prep, including related discussions and correspondence with MWE team re same (2.0); legal research on [REDACTED], including related discussions re same (1.5); conference with MWE team re trial strategy and issues, including correspondence and follow-up on same (.5); attention to document productions and related trial prep (1.0).
B190	01/24/25	E. Keil	8.90	Draft correspondence re Lakeside ERCs (1.3); correspondence with G. Hayes re same (.4); review stipulation of facts markup (.3); revise same (.5); conference with B. Tiemann, B. Jones, et al. re depositions (2.1); conference with MWE team re same (1.5); revise reply brief re same (2.8).
B190	01/24/25	H. Udow	2.60	Conference with MWE team re trial preparation (1.0); review Synergy documents for privilege (1.6).
B190	01/24/25	D. Simon	7.70	Trial prep and deposition prep sessions (4.5); review burden standard and accompanying case law (1.2); multiple communications with client, IRS and plan sponsor re settlement constructs and strategies (2.0).
B190	01/25/25	T. Cramton	3.20	Participate in trial prep conference with MWE team, including follow-up communications re workstreams (3.2).
B190	01/25/25	E. Keil	10.40	Research re [REDACTED] (1.9); conference with MWE team re IRS claim trial prep (2.1); prepare outlines for case-in-chief (1.4); revise Synergi declaration (2.1); conference with D. Simon re same (.4); revise stipulation of facts (.8); revise reply brief (1.7).
B190	01/25/25	N. Bull	5.50	Multiple conferences with MWE team re trial prep for IRS issues (3.5); review materials (2.0).
B190	01/25/25	B. Tiemann	2.00	Conference with N. Bull, T. Cramton, E. Keil and S. Simon re trial preparation (2.0).



LaVie Care Centers, LLC

Client: 120098  
Invoice: 4002630  
Invoice Date: 03/30/25

Task	Date	Name	Hours	Description
B190	01/25/25	D. Simon	4.00	Numerous conferences with trial team re IRS dispute (2.2); review materials in connection with same (1.8).
B190	01/26/25	H. Udow	1.30	Review Synergy documents for privilege (1.3).
B190	01/26/25	D. Simon	1.50	Multiple conferences with DIP lenders and client re hearing and deposition prep (1.5).
B190	01/26/25	T. Cramton	4.90	Correspondence with MWE team on legal strategy and issues, including burden of proof and standard of review (.5); begin drafting direct outline and deposition prep for G. Hayes and B. Jones (3.5); conference with E. Keil on legal issues/analysis and trial prep (.9).
B190	01/26/25	C. Kraftsow	3.20	Research re [REDACTED] (2.90); correspond with E. Keil, T. Cramton re same (.3).
B190	01/26/25	J. Haake	4.70	Draft 9019 motion for settlement with IRS (3.4); draft motion for emergency hearing on 9019 motion and correspondence with D. Simon re same (1.3).
B190	01/26/25	J. Haims	1.00	Correspondence with MWE team re discovery, hearing and deposition prep, and strategy (1.0).
B190	01/26/25	E. Keil	12.50	Research re [REDACTED] (2.5); revise reply brief re ERC substantiation (6.4); conference with T. Cramton re same (1.0); revise reply brief re IRS notices (2.6).
B190	01/26/25	D. Ratnoff	3.70	Review and analyze federal law re taxpayer statutory interpretation (3.4); conference with E. Keil and T. Cramton re same (.3).
B190	01/27/25	C. Kraftsow	0.80	Draft summary of research re [REDACTED] (.6); correspond with E. Keil, T. Cramton re same (.2).
B190	01/27/25	J. Haims	1.00	Correspondence with MWE team re discovery, hearing and deposition prep, and strategy (1.0).
B190	01/27/25	T. Mondloch	3.50	Research re [REDACTED] (3.5).
B190	01/27/25	T. Cramton	7.00	Trial prep for 2/4/2025 tax credit issue, including marshalling evidence, deposition prep, and direct exam outline (4.0); legal research, conferences and correspondence with MWE team re same (2.5); conferences and correspondence with team re IRS settlement and remaining production (.5).
B190	01/27/25	E. Keil	12.00	Revise reply brief re IRS (5.6); draft order



LaVie Care Centers, LLC

Client: 120098  
Invoice: 4002630  
Invoice Date: 03/30/25

Task	Date	Name	Hours	Description
B190	01/27/25	A. Schiller	5.00	demonstrative (1.8); conference with D. Simon re settlement (.3); revise settlement motion (3.8); conference with UCC re settlement (.5). Prepare for case development review of two sets of SYN-LAVIE documents provided by DLA Piper (1.4); provide case team means to identify and update status of privileged documents for privilege log (.4); create two LaVie document productions (2.0); review same for quality assurance (.8); prepare deliverable of same (.4).
B190	01/27/25	D. Ratnoff	2.30	Review and analyze federal law re taxpayer statutory interpretation (2.3).
B190	01/27/25	C. Lee	0.50	Research precedent re IRS stipulation (.5).
B190	01/27/25	H. Udow	3.40	Review Synergy documents for privilege (.7); draft privilege log (2.7).
B190	01/27/25	D. Simon	7.00	Review trial prep and deposition issues (1.4); numerous conferences with IRS, plan sponsor, client re settlement discussions (3.0); conference with Committee re same (.5); review and revise settlement motions (.8); communications re settlement strategies (1.3).
B190	01/27/25	N. Bull	1.00	Review deposition transcript and pleadings (1.0).
B190	01/28/25	E. Keil	4.90	Revise 9019 motion (1.9); revise emergency hearing motion (1.8); conferences with D. Simon re same (.4); research re government approval motions (.8).
B190	01/28/25	J. Haims	1.00	Correspondence with MWE team re discovery, hearing and deposition prep, proposed settlement, and strategy (1.0).
B190	01/28/25	D. Simon	2.80	Conferences with IRS and Committee re settlement matters and related approvals (1.7); review and revise motion re same (.8); conferences with plan sponsor re additional funding (.3).
B190	01/29/25	T. Cramton	0.50	Correspondence and conference re settlement and Committee objection (.5).
B190	01/29/25	A. Schiller	0.50	Provide LaVie document production sets to UCC counsel (.5).
B190	01/29/25	D. Northrop	0.50	File (i) Debtors' motion for entry of order (a) authorizing Debtors' entry into, and performance under, ERC settlement with Internal Revenue Service, (b) approving the ERC settlement, and (c)



LaVie Care Centers, LLC

Client: 120098  
Invoice: 4002630  
Invoice Date: 03/30/25

Task	Date	Name	Hours	Description
				granting related relief, and (ii) Debtors' emergency motion for entry of order shortening notice and scheduling expedited hearing on Debtors' motion for approval of ERC settlement with the IRS (.5).
B190	01/29/25	J. Haims	0.70	Correspondence re IRS claim settlement and strategy (.7).
B190	01/29/25	E. Keil	5.00	Conferences with D. Simon re 9019 motion (.4); research re government approval for same (.6); conference with J. Rill, H. Bilicki, et al. re same (.3); revise same (2.6); revise emergency hearing motion (.9); correspondence with D. Northrop re filing of same (.2).
B190	01/29/25	D. Simon	2.30	Numerous conferences with plan sponsor and IRS re motion and approvals (1.3); revise settlement motion for filing (1.0).
B190	01/30/25	J. Haims	0.70	Review motion for approval of IRS claim settlement and correspondence re same, hearing, and strategy (.7).
B190	01/30/25	T. Cramton	1.30	Correspondence and updates on UCC objection to proposed IRS settlement (.5); review Synergi deposition transcript (.8).
B190	01/30/25	E. Keil	1.70	Research re government approval and 9019 settlements (1.3); conferences and correspondence with D. Simon re same (.4).
B190	01/30/25	D. Simon	1.50	Numerous conferences with Committee, plan sponsor and IRS re settlement issues (1.5).
B190	01/31/25	J. Haake	0.90	Prepare for and conference with D. Simon re remittance of funds request (.9).
B190	01/31/25	J. Haims	0.50	Correspondence with MWE team re IRS claim settlement and strategy (.5).
B190	01/31/25	E. Keil	2.60	Conferences with A. Marchant-Lessa re notice requirements for 9019 motion (.4); conferences and correspondence with D. Simon re same (.3); draft Jones direct outline re same (1.9).
B190	01/31/25	D. Simon	3.10	Conferences with client and internal re hearing prep (.7); review plan and related materials (1.4); prepare for hearing (1.0).
B190	01/31/25	N. Bull	0.40	Correspondence with MWE team and UCC re IRS settlement (.4).
B210	01/09/25	D. Northrop	0.80	File monthly operating reports for November 2024





LaVie Care Centers, LLC

Client: 120098  
Invoice: 4002630  
Invoice Date: 03/30/25

Task	Date	Name	Hours	Description
				for three separate Debtor groups (.8).
B210	01/09/25	E. Keil	0.60	Review November MORs and prepare for filing (.6).
B210	01/29/25	J. Haake	1.50	Conference with E. Keil re remittance of fund issue (.5); conference with R. Ahmed re same (.3); correspondence with Verita re service issues (.4); correspondence with D. Simon re remittance of funds issue (.3).
B210	01/31/25	E. Keil	1.20	Conference with J. Haake, D. Simon re new operator funds (.4); review December MORs (.6); correspondence with J. Brilliant, B. Jones, D. Northrop re filing of same (.2).
B210	01/31/25	D. Northrop	0.70	File monthly operating reports for December 2024 for three separate Debtor groups (.7).
B230	01/07/25	J. Jumbeck	1.30	Review terms of DIP termination date extension (.2); review and analyze DIP credit agreement (.3); draft letter extension re DIP termination date (.8).
B230	01/16/25	E. Keil	0.30	Draft notice of revised DIP budget (.3).
B230	01/31/25	E. Keil	0.40	Draft notice of revised DIP budget (.3); correspondence with D. Simon, D. Northrop re filing of same (.1).
B230	01/31/25	D. Northrop	0.20	File notice of revised DIP budget (dated 1/3/2025) (.2).
B240	01/22/25	E. Keil	0.30	Correspondence with B. Baron, K. Furr re Harts Harbor taxes (.3).
B270	01/28/25	J. Haake	1.00	Correspondence with S. Brazill re utility issues (.5); conferences with R. Cravitz re same (.5).
B270	01/29/25	J. Haake	0.40	Correspondence with R. Cravitz re utilities issues (.4).
B270	01/31/25	J. Haake	0.40	Conference with B. Cravitz re utility issue (.4).
B280	01/30/25	E. Keil	0.30	Correspondence with J. Watson re Access contracts (.3).
B310	01/28/25	J. Haake	1.00	Conferences and correspondence with E. Keil and S. Reitzel re asserted claim for funds from divested facility (1.0).
B320	01/06/25	D. Simon	0.40	Conferences with Synergy re closing matters and plan issues (.4).
B320	01/08/25	E. Keil	0.40	Correspondence with D. Thomas re third-party releases, claims (.4).
B320	01/31/25	D. Simon	0.50	Conference with Welltower re closing matters (.5).





**McDermott  
Will & Emery**

LaVie Care Centers, LLC

Client: 120098  
Invoice: 4002630  
Invoice Date: 03/30/25

Task	Date	Name	Hours	Description
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**Total Hours 607.70**

### Timekeeper Summary

Name	Hours	Rate	Amount
F. Belayneh	0.50	280.00	140.00
N. Bull	6.90	1,650.00	11,385.00
T. Cramton	56.50	1,290.00	72,885.00
A. Garcia	3.00	280.00	840.00
J. Haake	18.90	1,335.00	25,231.50
J. Haims	73.90	1,830.00	135,237.00
J. Jumbeck	1.30	1,245.00	1,618.50
E. Keil	185.50	1,245.00	230,947.50
C. Kraftsow	4.00	805.00	3,220.00
E. Kwon	1.00	570.00	570.00
C. Lee	1.60	1,155.00	1,848.00
T. Mondloch	3.50	805.00	2,817.50
D. Northrop	7.80	745.00	5,811.00
D. Ratnoff	6.00	805.00	4,830.00
A. Schiller	24.20	570.00	13,794.00
D. Simon	122.20	1,650.00	201,630.00
B. Tiemann	51.80	1,575.00	81,585.00
H. Udow	37.50	1,200.00	45,000.00
D. Valentino	1.60	280.00	448.00
<b>Totals</b>	<b>607.70</b>		<b>\$839,838.00</b>

### Task Code Summary

Task Code	Description	Hours	Amount
B110	Case Administration	0.40	534.00
B140	Relief from Stay/Adequate Protection Proceedings	7.60	10,119.00
B150	Mtgs/Communications w/Creditor	0.30	400.50
B155	Court Hearings	11.80	16,303.00
B160	Fee/Employment Applications	5.20	6,374.00
B185	Assumption/Rejection of Leases	2.10	2,596.50



LaVie Care Centers, LLC

Client: 120098  
Invoice: 4002630  
Invoice Date: 03/30/25

Task Code	Description	Hours	Amount
B190	Other Contested Matters	568.60	789,043.00
B210	Business Operations	4.80	5,361.00
B230	Financing/Cash Collections	2.20	2,639.00
B240	Tax Issues	0.30	373.50
B270	Utilities	1.80	2,403.00
B280	Vendor Matters	0.30	373.50
B310	Claims Administration & Object	1.00	1,335.00
B320	Plan and Disclosure Statement	1.30	1,983.00
		607.70	839,838.00



LaVie Care Centers, LLC

Client: 120098  
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Invoice Date: 03/30/25

## Costs and Other Charges

Description	Amount
Computer Research	8,073.66
Computer Research	
Computer Usage Charge - Data Review & Production Software	6,008.40
"January monthly fee for Discovery Platform Use (RelativityOne, 592.34 GBs)"	
Depositions	2,677.40
VENDOR: Naegeli Deposition and Trial; INVOICE#: 43665; DATE: 1/2/2025 - Deposition fees re LaVie Care Centers LLC for witness Benjamin Jones	
Document Services	1,754.35
VENDOR: Capital Reporting Company; INVOICE#: 8020334; DATE: 1/22/2025 - Transcription services re LaVie Care Center, LLC v. (2455507(PMB))	
Express Mail	29.39
VENDOR: Federal Express Corporation; INVOICE#: 874695989; DATE: 1/21/2025	
Filing/Registration Fee	200.00
VENDOR: US District Court Northern District of Georgia; INVOICE#: 011625; DATE: 1/16/2025 - Admission and filing fees for applications by McDermott attorneys Joel Haims and Brian Tiemann for admission pro hac vice in the LaVie Care Centers, LLC, et al. chapter 11 case, Case No. 24-55507 (PMB)	
Messenger/Courier	84.93
VENDOR: Georgia Messenger Service LLC; INVOICE#: 8547-439; DATE: 1/18/2025 - Courier services for Atlanta office	
Messenger/Courier	27.53
VENDOR: Federal Express Corporation; INVOICE#: 874698411; DATE: 1/21/2025 - Shipping charges	
Obtain Copy of Transcripts	262.80
VENDOR: eScribers LLC; INVOICE#: 1091419; DATE: 1/21/2025 - Obtain transcript of January 17, 2025 emergency discovery conference with respect to contested matter relating to Debtors' objection to IRS's proof of claim no. 5247 in In re LaVie Care Centers, LLC, et al., Case No. 24-55507 (PMB) (U.S. Bankruptcy Court for the Northern District of Georgia)	
Obtain Copy of Transcripts	1,810.80
VENDOR: Capital Reporting Company; INVOICE#: 8036198; DATE: 1/29/2025 - A. Reynolds, S. Priddy, S. Gibbons deposition transcripts	
Search Fees	121.41
VENDOR: Chapter 11 Dockets; INVOICE#: 139339; DATE: 1/14/2025 - Searches and complaints pulled in December 2024	
<b>Total Costs and Other Charges</b>	<b>\$21,050.67</b>

**EXHIBIT A-9**

**Time and Expense Detail**  
***February 1, 2025 – February 28, 2025***



Invoice: 4002673  
Client: 120098

03/31/25

LaVie Care Centers, LLC  
1040 Crown Pointe Parkway  
Atlanta, GA 30338

For Services Rendered in Connection with:

Matter: 0013 Chapter 11

Task	Date	Name	Hours	Description
B140	02/27/25	J. Haake	0.30	Correspondence with E. Keil and E. Stefanski re state court litigation and stay issues (.3).
B150	02/06/25	J. Haake	0.50	Conference with B. Cravitz re utility issues (.1); correspondence with F. Lawall re late filed claim (.2); conference with counsel of divested facility re claims (.2).
B155	02/03/25	E. Keil	2.50	Revise hearing agenda (.2); prepare exhibits, demonstratives for hearing (2.3).
B155	02/04/25	D. Simon	5.00	Prepare for contested hearing (2.5); participate in hearing (2.5).
B155	02/04/25	E. Keil	4.90	Prepare and participate in omnibus hearing (4.9).
B155	02/04/25	N. Bull	2.00	Participate in hearing re IRS settlement (2.0).
B155	02/05/25	D. Northrop	0.30	Obtain transcript of 2/4/2025 hearing on the Debtors' motion for approval of ERC settlement with the IRS (.1); review same (.1); correspondence with MWE team re same (.1).
B155	02/13/25	D. Simon	1.00	Prepare for and participate in hearing re IRS objection (1.0).
B160	02/03/25	E. Keil	0.40	Draft MWE fee application (.4).
B160	02/10/25	D. Northrop	0.40	File December 2024 and January 2025 staffing reports for Ankura Consulting Group, LLC (.4).
B160	02/21/25	E. Keil	0.20	Correspondence with D. Northrop, N. Herman re OCP declarations (.2).
B185	02/10/25	E. Keil	0.30	Correspondence with K. Furr, J. Watson, et al. re Harts Harbor (.3).
B185	02/18/25	E. Keil	0.20	Correspondence with J. Watson, K. Furr re Harts Harbor (.2).
B185	02/21/25	E. Keil	0.30	Correspondence with J. Muenker, J. Wisler re Cigna (.3).
B190	02/03/25	J. Haims	0.50	Review UCC's objection to IRS claim settlement (.2); correspondence re same, settlement approval



LaVie Care Centers, LLC

Client: 120098  
Invoice: 4002673  
Invoice Date: 03/31/25

Task	Date	Name	Hours	Description
				hearing, and strategy (.3).
B190	02/03/25	T. Cramton	0.50	Review and analyze UCC objection to IRS ERC settlement (.5).
B190	02/03/25	D. Simon	7.50	Multiple witness prep sessions (2.0); review and analyze Committee IRS objections (1.5); prepare for contested evidentiary hearing (4.0).
B190	02/03/25	N. Bull	0.80	Revise direct examination outline for B. Jones (.4); conferences with D. Simon and B. Jones (.4).
B190	02/03/25	D. Northrop	0.50	Review Debtors' agenda and witness list for the 2/4/2025 hearing on Debtors' motion for approval of ERC settlement with the IRS, and correspondence with E. Keil re revisions to same (.1); file Debtors' agenda and witness list for the 2/4/2025 hearing (.2); review Official Committee of Unsecured Creditors' objection to the Debtors 9019 settlement motion and witness list for the 2/4/2025 hearing (.1);
B190	02/03/25	E. Keil	9.00	correspondence with MWE team re same (.1). Correspondence with V. Jones re IRS POCs (.3); review UCC objection (.6); research re [REDACTED] (5.6); prepare summary re same (1.3); draft Brandon stipulation re adversary proceeding (1.2).
B190	02/04/25	D. Simon	1.50	Multiple follow up conferences with Ankura and plan sponsor re settlement in connection with IRS issues (1.5).
B190	02/05/25	D. Simon	3.20	Multiple conferences and communications with IRS, plan sponsor and Committee re revised settlement terms (3.2).
B190	02/05/25	E. Keil	0.20	Correspondence with E. Green re Brandon stipulation (.2).
B190	02/05/25	B. Tiemann	2.50	Research [REDACTED] (1.5); correspondence with E. Keil and D. Simon re same (.7); conference with E. Keil and D. Simon re same (.3).
B190	02/06/25	D. Simon	1.40	Multiple conferences with IRS, Committee and plan sponsor re revised settlement (1.2); conference with J. Decker re same (.2).
B190	02/07/25	D. Simon	0.50	Conferences with Committee and IRS re settlement issues (.5).



**McDermott  
Will & Emery**

LaVie Care Centers, LLC

Client: 120098  
Invoice: 4002673  
Invoice Date: 03/31/25

Task	Date	Name	Hours	Description
B190	02/10/25	E. Keil	0.60	Correspondence with B. Taylor, A. Marchant-Lessa re Brandon adversary (.4); revise stipulation re same (.2).
B190	02/10/25	D. Simon	1.40	Conferences with IRS, Committee and plan sponsor re revised settlement (1.4).
B190	02/11/25	D. Simon	1.00	Multiple communications with IRS and Committee re settlement and hearing (.8); communications with IRS re remaining priority claims (.2).
B190	02/11/25	E. Keil	0.60	Revise settlement order (.6).
B190	02/12/25	E. Keil	1.60	Revise 9019 order (.4); correspondence with IRS, UCC re same (.2); correspondence with D. Northrop re filing of same (.1); conference with F. Lawall re same (.2); correspondence with J. Rill re executed acknowledgment letter (.2); correspondence with V. Jones re IRS claim amendments (.3); correspondence with Verita re same (.2).
B190	02/12/25	D. Northrop	0.40	Review notice of filing of modified ERC settlement order and finalize same for filing (.1); file notice of filing of modified ERC settlement order (.2); upload modified ERC settlement order via the ECF order upload function (.1).
B190	02/13/25	E. Keil	0.60	Conference with V. Jones re IRS claims (.4); correspondence with S. Reitzel, V. Jones re same (.2).
B190	02/14/25	E. Keil	0.30	Correspondence with Verita re IRS claims (.3).
B190	02/18/25	E. Keil	0.20	Correspondence with V. Jones re IRS claims register (.2).
B190	02/19/25	E. Keil	0.30	Correspondence with B. Taylor re Brandon adversary (.1); revise stipulation re same (.2).
B190	02/19/25	D. Simon	0.70	Multiple communications re IRS, Brandon and Harts Harbor matters (.7).
B190	02/20/25	D. Simon	0.50	Conference with Brandon litigants re stay issues (.3); conference with D. Dias re open matters (.2).
B190	02/20/25	E. Keil	1.10	Conference with B. Taylor, D. Simon re Brandon adversary proceeding (.3); review revised stipulated order re same (.2); conference with V. Jones re IRS tax claims (.1); correspondence with KCC re same (.1); correspondence with D. Thomas, L. Aiken re solicitation service of adversary defendants and analysis re same (.4).





LaVie Care Centers, LLC

Client: 120098  
Invoice: 4002673  
Invoice Date: 03/31/25

Task	Date	Name	Hours	Description
B190	02/21/25	E. Keil	1.10	Conference with D. Marker, C. Dale, D. Simon re IRS settlement (.4); revise stipulation re Brandon adversary (.3); correspondence with B. Taylor re same (.1); correspondence with D. Northrop re filing of same (.1); correspondence with Verita re GLPL lawsuits for service (.2).
B190	02/21/25	D. Simon	1.00	Conference with Midcap re IRS and closing matters (.4); conference with J. Watson re open litigation matters (.6).
B190	02/24/25	E. Keil	0.60	Correspondence with A. Marchant-Lessa re Brandon adversary stipulation (.2); review IRS claim information and correspondence with K. Lanier, D. Simon re same (.4).
B190	02/25/25	E. Keil	0.30	Correspondence with V. Jones, G. Hayes re tax returns (.3).
B190	02/26/25	J. Haake	0.20	Correspondence with E. Keil re case administration and litigation issues (.2).
B190	02/26/25	E. Keil	0.20	Correspondence with V. Jones, S. Reitzel re IRS claims (.2).
B190	02/27/25	D. Simon	0.50	Review recoupment matters (.3); conference with J. Watson and E. Keil re same (.2).
B190	02/28/25	E. Keil	0.10	Conference with V. Jones re IRS claims (.1).
B195	02/02/25	E. Keil	1.40	Travel to Atlanta from Chicago for 2/4/2025 hearing (travel time billed at 50%).
B195	02/04/25	E. Keil	1.60	Travel to Chicago from Atlanta following hearing (travel time billed at 50%).
B210	02/25/25	E. Keil	0.20	Correspondence with J. Watson re remittances (.2).
B210	02/26/25	E. Keil	0.60	Conferences and correspondence with Sunshine Health re recoupment efforts (.6).
B240	02/13/25	G. Karch	0.50	Consider fiscal year question and correspondence with B. Baron (.5).
B240	02/26/25	G. Karch	0.30	Correspondence with B. Baron re calendar tax year for new corporation (.3).
B240	02/28/25	M. Ghazi	0.20	Review correspondence re tax issues (.2).
B270	02/11/25	J. Haake	0.40	Conference with B. Cravitz re utility issue (.4).
B280	02/10/25	J. Haake	0.40	Correspondence with E. Keil and D. Simon re Citadel claim to funds (.4).
B320	02/26/25	E. Keil	0.60	Correspondence with Synergy re Lamana and third-party releases (.6).



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LaVie Care Centers, LLC

Client: 120098  
Invoice: 4002673  
Invoice Date: 03/31/25

Task	Date	Name	Hours	Description
B320	02/27/25	E. Keil	0.90	Analysis re Lamana releases (.6); correspondence with Synergy counsel re same (.3).
<b>Total Hours</b>			<b>66.80</b>	

#### Timekeeper Summary

Name	Hours	Rate	Amount
N. Bull	2.80	1,650.00	4,620.00
T. Cramton	0.50	1,290.00	645.00
M. Ghazi	0.20	1,350.00	270.00
J. Haake	1.80	1,335.00	2,403.00
J. Haims	0.50	1,830.00	915.00
G. Karch	0.80	2,210.00	1,768.00
E. Keil	30.90	1,245.00	38,470.50
D. Northrop	1.60	745.00	1,192.00
D. Simon	25.20	1,650.00	41,580.00
B. Tiemann	2.50	1,575.00	3,937.50
<b>Totals</b>	<b>66.80</b>		<b>\$95,801.00</b>

#### Task Code Summary

Task Code	Description	Hours	Amount
B140	Relief from Stay/Adequate Protection Proceedings	0.30	400.50
B150	Mtgs/Communications w/Creditor	0.50	667.50
B155	Court Hearings	15.70	22,636.50
B160	Fee/Employment Applications	1.00	1,045.00
B185	Assumption/Rejection of Leases	0.80	996.00
B190	Other Contested Matters	41.40	60,351.00
B195	Non-Working Travel	3.00	3,735.00
B210	Business Operations	0.80	996.00
B240	Tax Issues	1.00	2,038.00
B270	Utilities	0.40	534.00
B280	Vendor Matters	0.40	534.00
B320	Plan and Disclosure Statement	1.50	1,867.50
		<b>66.80</b>	<b>95,801.00</b>



LaVie Care Centers, LLC

Client: 120098  
Invoice: 4002673  
Invoice Date: 03/31/25

## Costs and Other Charges

Description	Amount
Business Meal	47.70
Dinner meal on 2/3 (E. Keil)	
Business Meal	43.73
Lunch meals on 2/3 (B. Jones, D. Simon, E. Keil)	
Business Meal	184.27
Lunch meals on 2/4 (J. Muenker, B. Jones, E. Keil)	
Computer Research	4,752.43
Computer Research	
Computer Usage Charge - Data Review & Production Software	6,000.00
"February monthly fee for Discovery Platform Use (RelativityOne, 587.53 GBs)"	
Document Services	146.00
VENDOR: eScribers LLC; INVOICE#: 1097841; DATE: 2/3/2025 - Obtain transcript of January 30, 2025 hearing on Debtors' motion to shorten notice and for an expedited hearing with respect to Debtors' 9019 motion for approval of settlement agreement with the IRS in In re LaVie Care Centers, LLC, et al., Case No. 24-55507 (PMB) (U.S. Bankruptcy Court for the Northern District of Georgia)	
Document Services	496.40
VENDOR: eScribers LLC; INVOICE#: 1099406; DATE: 2/5/2025 - Obtain transcript of February 4, 2025 hearing on Debtors' motion for approval of ERC settlement with the IRS in In re LaVie Care Centers, LLC, et al., Case No. 24-55507 (PMB) (U.S. Bankruptcy Court for the Northern District of Georgia)	
Document Services	81.90
VENDOR: eScribers LLC; INVOICE#: 1106534; DATE: 2/18/2025 - Obtain transcript of February 13, 2025 hearing on Debtors' 9019 motion for approval of ERC settlement with the IRS in In re LaVie Care Centers, LLC, et al., Case No. 24-55507 (PMB) (U.S. Bankruptcy Court for the Northern District of Georgia)	
Travel Expenses	667.37
Round trip airfare (Chicago - Atlanta) for omnibus hearing on 2/2 - 2/4 (E. Keil)	
Travel Expenses	35.99
Lyft ride from Atlanta airport to hotel on 2/2 (E. Keil)	
Travel Expenses	6.75
Lyft ride from hotel to MWE Atlanta office on 2/4 (E. Keil)	
Travel Expenses	36.78
Lyft ride from MWE Atlanta office to Atlanta airport on 2/4 (E. Keil)	
Travel Expenses	732.44
Hotel accommodation in Atlanta, GA for omnibus hearing on 2/2 - 2/4 (E. Keil)	
<b>Total Costs and Other Charges</b>	<b>\$13,231.76</b>

**EXHIBIT A-10**

**Time and Expense Detail**  
***March 1, 2025 – March 30, 2025***



Invoice: 4012795  
Client: 120098

04/30/25

LaVie Care Centers, LLC  
1040 Crown Pointe Parkway  
Atlanta, GA 30338

For Services Rendered in Connection with:

Matter: 0013 Chapter 11

Task	Date	Name	Hours	Description
B110	03/03/25	J. Haake	0.40	Correspondence with F. Lawall and F. Nason re case administration issues (.4).
B130	03/07/25	E. Keil	1.20	Review Harts Harbor OTA (.6); correspondence with J. Watson, D. Simon re same (.2); conference with D. Simon re same (.4).
B130	03/11/25	E. Keil	1.30	Conference with Harts Harbor counsel re OTA (1.1); correspondence and conference with D. Simon re same (.2).
B130	03/11/25	D. Simon	1.50	Prepare for and participate in conference re Harts Harbor OTA (1.5).
B130	03/12/25	D. Simon	1.40	Revise Harts Harbor OTA (1.4).
B130	03/13/25	D. Simon	1.50	Conference with J. Watson re Harts OTA issues (.5); continue to mark-up same (1.0).
B130	03/14/25	D. Simon	0.70	Further revisions to OTA (.7).
B130	03/17/25	E. Keil	2.20	Revise Harts Harbor motion (2.2).
B130	03/18/25	E. Keil	2.80	Revise Harts Harbor sale/transfer motion (2.8).
B130	03/19/25	D. Simon	0.40	Conference re Harts Harbor issues and next steps (.4).
B130	03/19/25	E. Keil	1.20	Revise Harts Harbor motion (1.2).
B130	03/20/25	E. Keil	5.40	Revise Harts Harbor motion, OTA, and related notices (5.4).
B130	03/21/25	E. Keil	0.70	Revise Harts Harbor motion (.5); correspondence with D. Simon, J. Bailey re same (.2).
B130	03/24/25	D. Simon	0.60	Conferences with E. Keil and J. Muenker re OTA and closing matters (.6).
B130	03/25/25	E. Keil	0.70	Revise OTA, Harts Harbor motion (.7).
B130	03/25/25	D. Simon	0.50	Review comments to Harts Harbor OTA (.5).
B130	03/26/25	E. Keil	1.60	Revise Harts Harbor OTA, motion (1.3); correspondence with New Operator re same (.3).
B130	03/27/25	E. Keil	4.40	Conference with D. Simon, J. Watson re Harts Harbor (.7); draft issues list re same (.3); conference



LaVie Care Centers, LLC

Client: 120098  
Invoice: 4012795  
Invoice Date: 04/30/25

Task	Date	Name	Hours	Description
				with New Operator re same (.5); conferences with D. Simon re same (.7); revise OTA, motion, and proposed order re same (2.2).
B130	03/27/25	D. Simon	2.00	Conference with New Operator re OTA (.5); multiple prep and follow up conferences re changes (.7); review and revise changes with E. Keil (.8).
B130	03/28/25	D. Simon	0.50	Review Harts Harbor OTA matters (.5).
B130	03/31/25	E. Keil	1.00	Correspondence with New Operator, G. Hayes, J. Watson, A. Levin re Harts Harbor (.6); revise motion re same (.4).
B155	03/11/25	J. Haake	0.50	Prepare for and participate in hearing re settlement (.5).
B155	03/31/25	D. Northrop	0.20	File notice of cancelled omnibus hearing (scheduled for April 1, 2025) (.2).
B160	03/03/25	E. Keil	0.80	Review December 2024 time detail for privilege issues and compliance with local rules (.8).
B160	03/26/25	E. Keil	0.70	Revise January and February fee statements (.7).
B185	03/10/25	E. Keil	0.20	Correspondence with J. Muenker, D. Simon re Cigna (.2).
B185	03/17/25	E. Keil	0.20	Correspondence with J. Muenker re Cigna contracts (.1); correspondence with Cigna re same (.1).
B185	03/18/25	E. Keil	2.10	Draft revised assumed contracts list (.8); conference with D. Simon re same (.3); revise same (.4); correspondence with D. Northrop re same (.2); correspondence with G. Hayes re same (.2); correspondence with Cigna re assumed contracts (.2).
B185	03/31/25	E. Keil	0.80	Revise Cigna stipulation and related schedules (.6); correspondence with J. Muenker, D. Simon re same (.2).
B190	03/10/25	E. Keil	0.70	Correspondence with DOJ re settlement timing (.2); review adversary complaint re employee termination (.5).
B190	03/10/25	J. Haake	1.40	Correspondence with E. Kates re hearing (.2); correspondence and conferences with E. Stefanski re insurance issues (.8); correspondence and conference with D. Simon re litigation issues (.4).
B190	03/10/25	D. Northrop	0.20	Review pro se adversary complaint filed by E. Julien against LaVie Care Centers, LLC and summons issued by the clerk (.1); correspondence with MWE



**McDermott  
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LaVie Care Centers, LLC

Client: 120098  
Invoice: 4012795  
Invoice Date: 04/30/25

Task	Date	Name	Hours	Description
				team re same (.1).
B190	03/17/25	J. Haake	0.50	Correspondence and conferences with E. Stefanski and F. Lawall re litigation issues (.5).
B190	03/17/25	E. Keil	0.50	Conference with T. Remington re Brandon adversary (.2); analyze default standard re same (.3).
B190	03/18/25	E. Keil	0.30	Analysis re Brandon adversary proceeding (.3).
B190	03/25/25	E. Keil	1.80	Draft request for default and motion requesting default judgment in Brandon adversary proceeding (1.8).
B190	03/28/25	E. Keil	0.90	Draft joint dismissal for Brandon adversary (.4); research re same (.2); correspondence with Debtors re tax claim issues (.3).
B190	03/31/25	E. Keil	0.30	Correspondence with Brandon entities' counsel re joint notice of dismissal (.2); conference with T. Remington re same (.1).
B230	03/24/25	E. Keil	1.20	Conference and correspondence with MidCap re ABL (.2); conference with D. Simon re same (.2); conference with R. Ahmed re same (.2); research re same (.3); correspondence with L. Aiken re DIP order (.3).
B240	03/10/25	G. Karch	0.20	Correspondence with D. Simon re choice of fiscal year by LV Operations (.2).
B240	03/24/25	G. Karch	1.00	Consider analysis of entity classification election (.7); conference with D. Simon in preparation for conference with B. Baron and investors (.3).
B240	03/25/25	G. Karch	0.50	Conference with B. Baron re conversation with investors and consider information to provide (.5).
B280	03/05/25	E. Keil	1.10	Correspondence, conferences with Sunshine Health re recoupment attempts (.6); correspondence with J. Watson, D. Simon re same (.2); correspondence with debt collector re same (.3).
B280	03/06/25	E. Keil	0.50	Correspondence with D. Dias, J. Watson re Sunshine Health recoupment (.3); conference with D. Simon re same (.2).
B280	03/10/25	E. Keil	0.40	Conference and correspondence with M. Santos re Sunshine Health requests (.4).
B280	03/19/25	E. Keil	0.80	Correspondence with Iron Mountain, Access, J. Watson re medical records (.6); correspondence with J. Watson re Lument (.2).
B280	03/20/25	E. Keil	0.50	Correspondence with J. Watson re medical records





LaVie Care Centers, LLC

Client: 120098  
Invoice: 4012795  
Invoice Date: 04/30/25

Task	Date	Name	Hours	Description
				(.3); correspondence with same re Lumen (.2).
B280	03/21/25	E. Keil	0.20	Correspondence with J. Watson re medical records (.2).
B280	03/24/25	E. Keil	0.80	Correspondence with Access re invoices (.2); conference with J. Watson re medical records (.5); correspondence with J. Pyron re same (.1).
B310	03/04/25	J. Haake	0.70	Analysis of committee's objection to late filed claim (.5); correspondence with E. Keil re same (.2).
B310	03/05/25	E. Keil	0.40	Correspondence with K. Lanier, G. Hayes re IRS POC information (.3); correspondence with V. Jones re same (.1).
B310	03/06/25	E. Keil	0.70	Correspondence with KCC, V. Jones re 941 forms and amended tax claims (.4); review same (.3).
B310	03/11/25	E. Keil	3.60	Review tax claims filed by IRS and summarize same (3.6).
B310	03/12/25	E. Keil	1.30	Review and revise tax claims register (1.1); correspondence with V. Jones re same (.2).
B310	03/12/25	D. Simon	0.30	Review IRS claims (.3).
B310	03/13/25	E. Keil	1.50	Correspondence with G. Hayes, V. Jones re IRS claims (.3); correspondence with K. Lanier re same (.2); review materials and revised claims register re same (1.0).
B310	03/14/25	E. Keil	1.40	Revise claims register re tax claims (1.1); conference with D. Simon re same (.2); conference with V. Jones re same (.1).
B310	03/14/25	D. Simon	0.30	Conference with IRS re open claims (.3).
B320	03/06/25	D. Simon	0.40	Conferences with Synergy, Plan Sponsor re closing matters (.4).
B320	03/07/25	D. Simon	0.80	Review multiple closing communications (.8).
B320	03/18/25	D. Northrop	0.30	Review draft notice of fourth amended plan supplement and correspondence with E. Keil re certificate of service for same (.1); file notice of fourth amended plan supplement (.2).
B320	03/28/25	D. Simon	0.50	Conference with Synergy re open effective date matters (.5).
B470	03/27/25	A. Chatham	0.60	Review correspondence from plaintiffs' counsel in Brandon litigation re stipulation of dismissal without prejudice (.2); conference with D. Simon re same (.1); send proposed revisions on same (.3).



LaVie Care Centers, LLC

Client: 120098  
Invoice: 4012795  
Invoice Date: 04/30/25

Task	Date	Name	Hours	Description
B470	03/28/25	A. Chatham	0.30	Review filed version of stipulation and proposed order in Brandon litigation (.2); correspondence with D. Simon and E. Keil re same (.1).

**Total Hours 64.40**

#### Timekeeper Summary

Name	Hours	Rate	Amount
A. Chatham	0.90	1,525.00	1,372.50
J. Haake	3.50	1,335.00	4,672.50
G. Karch	1.70	2,210.00	3,757.00
E. Keil	46.20	1,245.00	57,519.00
D. Northrop	0.70	745.00	521.50
D. Simon	11.40	1,650.00	18,810.00
<b>Totals</b>	<b>64.40</b>		<b>\$86,652.50</b>

#### Task Code Summary

Task Code	Description	Hours	Amount
B110	Case Administration	0.40	534.00
B130	Asset Disposition	31.60	43,027.50
B155	Court Hearings	0.70	816.50
B160	Fee/Employment Applications	1.50	1,867.50
B185	Assumption/Rejection of Leases	3.30	4,108.50
B190	Other Contested Matters	6.60	8,288.00
B230	Financing/Cash Collections	1.20	1,494.00
B240	Tax Issues	1.70	3,757.00
B280	Vendor Matters	4.30	5,353.50
B310	Claims Administration & Object	10.20	13,005.00
B320	Plan and Disclosure Statement	2.00	3,028.50
B470	Litigation	0.90	1,372.50
		<b>64.40</b>	<b>86,652.50</b>



LaVie Care Centers, LLC

Client: 120098  
Invoice: 4012795  
Invoice Date: 04/30/25

## Costs and Other Charges

Description	Amount
Computer Research VENDOR: CourtAlert.com Inc.; INVOICE#: 310026-2502; DATE: 02/28/2025 - fee for case research	76.21
Computer Research VENDOR: CourtAlert.com Inc.; INVOICE#: 310026-2503; DATE: 03/31/2025 - fee for case research	80.02
<b>Total Costs and Other Charges</b>	<b>\$156.23</b>

**EXHIBIT A-11**

**Time and Expense Detail**  
***April 1, 2025 – April 30, 2025***



Invoice: 4023839  
Client: 120098

05/31/25

LaVie Care Centers, LLC  
1040 Crown Pointe Parkway  
Atlanta, GA 30338

For Services Rendered in Connection with:

Matter: 0013 Chapter 11

Task	Date	Name	Hours	Description
B110	04/14/25	J. Haake	0.50	Conference with J. Moore re tort claim and insurance issue (.5).
B110	04/15/25	J. Haake	0.30	Conference with J. Moore re tort claim and insurance issue (.3).
B110	04/24/25	J. Haake	0.10	Correspondence with T. Remington re case administration issues (.1).
B110	04/25/25	J. Haake	0.60	Prepare for and participate in conference with G. Hayes re workers compensation issues (.6).
B110	04/28/25	J. Haake	0.50	Prepare for and participate in conference with G. Hayes re workers compensation issues (.5).
B110	04/28/25	N. Rainey	1.10	Conference with D. Northrop re filing procedure and precedent re post-confirmation reports for all Debtor entities (.2); conference and multiple correspondence with court re same (.3); electronically file x3 post-confirmation reports (.4); correspondence with E. Keil re same (.2).
B110	04/29/25	J. Haake	0.20	Correspondence with D. Simon re case administration issues (.2).
B120	04/08/25	N. Rainey	0.90	Multiple correspondence with E. Keil re preparation and filing of Harts Harbor transfer motion and related motion to shorten notice (.2); finalize and electronically file same (.7).
B120	04/09/25	E. Keil	1.00	Correspondence re Harts Harbor with new operator (.5); revise notices re same (.5).
B120	04/18/25	N. Rainey	0.20	Electronically file affidavit of publication re Harts Harbor sale (.1); correspondence with E. Keil re same (.1).
B130	04/01/25	E. Keil	1.50	Revise Harts Harbor sale motion (.4); correspondence with G. Hayes, J. Watson re OTA revisions (.3); review and analyze same (.5); conferences with D. Simon re same (.3).



LaVie Care Centers, LLC

Client: 120098  
Invoice: 4023839  
Invoice Date: 05/31/25

Task	Date	Name	Hours	Description
B130	04/02/25	D. Simon	1.50	Conference with Synergy re open closing date matters (.5); review and revise OTA (1.0).
B130	04/03/25	D. Simon	1.20	Multiple conferences with E. Keil and J. Watson re OTA and sale motion (1.2).
B130	04/03/25	E. Keil	1.80	Correspondence with J. Watson, D. Simon re Harts Harbor OTA (.6); conferences with same re same (.4); revise same (.8).
B130	04/04/25	D. Simon	1.20	Multiple conferences with E. Keil and J. Watson re OTA revisions (1.2).
B130	04/04/25	E. Keil	4.10	Revise Harts Harbor OTA, motion, order, and related notices (2.9); conferences and correspondence with J. Watson, D. Simon re same (1.2).
B130	04/05/25	E. Keil	1.50	Revise OTA, motion for Harts Harbor (1.2); correspondence with J. Watson, D. Simon, New Operator re same (.3).
B130	04/07/25	D. Simon	2.00	Conference with PCC re contract assumption (.5); conference with Harts operator re OTA (.7); multiple review and revise re same (.8).
B130	04/07/25	E. Keil	4.10	Revise Harts Harbor OTA, motion, proposed order, related notices (3.5); revise motion to shorten re same (.6).
B130	04/08/25	E. Keil	5.00	Revise Harts Harbor motion, OTA, notices, proposed order (2.7); conferences with D. Simon re same (.6); revise motion to shorten (.4); prepare Harts Harbor documents for filing (.8); correspondence with N. Rainey, D. Simon re same (.5).
B130	04/08/25	D. Simon	1.00	Conferences with E. Keil and review of OTA for filing (1.0).
B130	04/10/25	C. Lee	0.30	Correspond with E. Keil re Harts Harbor OTA schedules (.1); review and analyze OTA, precedent re same (.2).
B130	04/10/25	E. Keil	0.80	Correspondence with New Operator re notices (.3); correspondence with D. Simon, J. Watson re same (.2); correspondence with C. Lee re OTA schedules (.3).
B130	04/10/25	N. Rainey	0.30	Upload proposed order shortening notice re Harts Harbor sale motion (.2); correspondence with E. Keil re same (.1).



LaVie Care Centers, LLC

Client: 120098  
Invoice: 4023839  
Invoice Date: 05/31/25

Task	Date	Name	Hours	Description
B130	04/11/25	D. Simon	1.00	Multiple conferences with E. Keil, R. Ahmed re closing matters (1.0).
B130	04/11/25	E. Keil	1.90	Revise proposed order re motion to shorten (.3); correspondence with N. Rainey re same (.1); revise sale, contract assumption notices (.6); prepare same for filing (.3); correspondence with Verita re service of same (.3); correspondence with A. Levin re publication (.3).
B130	04/11/25	N. Rainey	0.30	Electronically file Harts Harbor sale notice (.2); correspondence with E. Keil re same (.1).
B130	04/14/25	C. Lee	1.40	Draft Harts Harbor OTA schedules (.5); review and analyze Debtor schedules and statements re same (.6); correspondence with E. Keil re same (.3).
B130	04/14/25	D. Simon	0.50	Multiple conferences with E. Keil re closing matters (.5).
B130	04/14/25	E. Keil	0.60	Correspondence with D. Simon, G. Hayes re Harts Harbor diligence (.4); correspondence with A. Levin re publication status (.2).
B130	04/15/25	D. Simon	1.30	Multiple conferences and correspondence with E. Keil re sale closing issues (1.3).
B130	04/15/25	E. Keil	1.60	Conference with New Operator re Harts Harbor (.3); conferences with D. Simon, D. Dias re same (.8); revise OTA, proposed order (.5).
B130	04/16/25	D. Simon	1.40	Multiple conferences with client and Synergy re plan closing matters and OTA (1.4).
B130	04/16/25	E. Keil	0.70	Revise Harts Harbor order and OTA (.5); conference with D. Simon re same (.2).
B130	04/17/25	E. Keil	0.60	Conference with V. Leung, P. Bradley, et al. re Harts Harbor sale order (.6).
B130	04/17/25	D. Simon	1.50	Multiple conferences with Synergy and DLA re OTA and other closing matters (1.5).
B130	04/18/25	E. Keil	1.20	Revise Harts Harbor schedules (1.2).
B130	04/21/25	E. Keil	0.60	Correspondence with New Operator re revised OTA, order (.2); revise same (.4).
B130	04/22/25	D. Simon	1.30	Participate in conference re closing checklist and sources and uses (.6); conferences re Harts Harbor matters (.7).
B130	04/22/25	E. Keil	0.20	Conference with D. Simon re Harts Harbor (.2).
B130	04/23/25	E. Keil	1.80	Revise proposed order re Harts Harbor (.5); draft notice of revisions re same (.3); revise OTA re same





LaVie Care Centers, LLC

Client: 120098  
Invoice: 4023839  
Invoice Date: 05/31/25

Task	Date	Name	Hours	Description
				(.4); compile same for filing (.3); review and revise schedules re OTA (.3).
B130	04/23/25	N. Rainey	0.50	Electronically file notice of revised Harts Harbor sale order and OTA (.2); upload revised sale order for the court's consideration (.2); correspondence with E. Keil re same (.1).
B130	04/24/25	E. Keil	0.60	Correspondence with New Operator re Harts Harbor closing, order (.2); revise and coordinate service of same (.4).
B130	04/24/25	N. Rainey	0.30	Upload revised proposed order re Harts Harbor sale (.2); correspondence with E. Keil re same (.1).
B130	04/28/25	D. Simon	0.70	Communications re Harts transition and effective date matters (.7).
B130	04/28/25	E. Keil	0.40	Correspondence with New Operator re Harts Harbor (.4).
B130	04/29/25	D. Simon	0.50	Multiple conferences and correspondence with E. Keil re Harts Harbor matters (.5).
B130	04/29/25	E. Keil	2.50	Conferences and correspondence with J. Watson, New Operator re Harts Harbor (1.9); finalize documents re same (.6).
B130	04/30/25	E. Keil	3.30	Conferences and correspondence with J. Watson, New Operator re signature pages, closing updates, etc. (3.3).
B140	04/10/25	J. Haake	0.70	Conference with R. Frederick re lift stay, tort claim, and insurance issue (.5); correspondence with J. Moore re lift stay issue (.2).
B150	04/08/25	E. Keil	0.30	Conference with File Vault re open invoices (.3).
B155	04/23/25	D. Simon	1.00	Prepare for next day's hearing (1.0).
B155	04/24/25	D. Simon	2.60	Prepare for and participate in hearing (2.6).
B155	04/24/25	E. Keil	1.00	Prepare for and participate in hearing re Harts Harbor sale (.8); draft notice of omnibus hearings (.1); correspondence with N. Rainey re filing of same (.1).
B155	04/24/25	N. Rainey	0.30	Electronically file sixth notice of omnibus hearings (.2); correspondence with E. Keil re same (.1).
B155	04/24/25	J. Haake	0.40	Correspondence with F. Lawall re hearing issues (.4).
B155	04/28/25	N. Rainey	0.30	Electronically file amended sixth notice of omnibus hearings (.2); correspondence with E. Keil re same (.1).



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LaVie Care Centers, LLC

Client: 120098  
Invoice: 4023839  
Invoice Date: 05/31/25

Task	Date	Name	Hours	Description
B155	04/29/25	D. Northrop	0.30	Obtain transcript of 4/24/2025 hearing re Debtors' motion for transfer of Harts Harbor operations and assets (.1); review same (.1); correspondence with MWE team re same (.1).
B155	04/29/25	N. Rainey	0.50	Electronically file second amended sixth notice of omnibus hearings (.2); electronically file notice cancelling 4/30/2025 omnibus hearing (.2); correspondence with E. Keil re same (.1).
B160	04/18/25	E. Keil	0.20	Revise Ankura staffing reports and quarterly fee report (.2).
B160	04/22/25	N. Rainey	0.70	Electronically file Ankura's February and March monthly staffing reports (.4); electronically file Ankura's quarterly staffing report (.2); correspondence with E. Keil re same (.1).
B185	04/02/25	E. Keil	0.20	Correspondence with J. Muenker re Cigna stipulation (.2).
B185	04/11/25	N. Rainey	0.30	Electronically file Harts Harbor contract notice (.2); correspondence with E. Keil re same (.1).
B185	04/15/25	E. Keil	0.30	Correspondence with UCC, Cigna re stipulation (.3).
B185	04/16/25	E. Keil	0.40	Correspondence with A. Marchant-Lessa re Cigna stipulation (.2); correspondence with UCC, Cigna re same (.2).
B185	04/21/25	E. Keil	0.20	Correspondence with UCC, Chambers re Cigna stipulation (.2).
B185	04/21/25	N. Rainey	0.30	Upload Cigna stipulation and agreed order for the court's consideration (.2); correspondence with E. Keil re same (.1).
B185	04/22/25	N. Rainey	0.20	Re-upload Cigna stipulation and agreed order for the court's consideration (.1); correspondence with E. Keil re same (.1).
B190	04/01/25	J. Haake	1.10	Prepare for and participate in conference with E. Stefanski re litigation issues (1.1).
B190	04/02/25	E. Keil	0.30	Correspondence with V. Jones re tax matters (.3).
B190	04/03/25	E. Keil	0.20	Correspondence with V. Jones re IRS tax claims (.2).
B190	04/08/25	E. Keil	0.40	Correspondence with V. Jones re tax abatements and related claims (.4).
B190	04/09/25	E. Keil	4.10	Draft motion to dismiss adversary proceeding and related brief (2.8); correspondence with J. Watson, Access re medical records (.4); review records re



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LaVie Care Centers, LLC

Client: 120098  
Invoice: 4023839  
Invoice Date: 05/31/25

Task	Date	Name	Hours	Description
				same (.9).
B190	04/14/25	E. Keil	0.70	Revise notice of dismissal re Brandon adversary (.3); correspondence with B. Taylor re same (.1); correspondence with J. Watson re Franklinton litigation (.3).
B190	04/15/25	E. Keil	0.80	Revise notice of dismissal re Brandon adversary (.2); correspondence with M. Bittman, B. Taylor re same (.3); revise same and prepare for filing (.2); correspondence with N. Rainey re filing of same (.1).
B190	04/16/25	E. Keil	0.60	Correspondence with counsel re Brandon dismissal notice (.3); correspondence with V. Jones re tax claims (.3).
B190	04/16/25	N. Rainey	0.30	Electronically file joint notice of dismissal re adversary proceeding (.2); correspondence with E. Keil re same (.1).
B190	04/17/25	E. Keil	4.60	Revise motion to dismiss and memorandum re same for Julien adversary (4.6).
B190	04/18/25	E. Keil	5.00	Revise motion to dismiss Julien adversary and memorandum re same (4.5); conferences with D. Simon, T. Cramton re same (.5).
B190	04/18/25	D. Simon	0.50	Review Vero Beach adversary (.5).
B190	04/21/25	D. Simon	1.10	Conference with Synergy re Vero Beach adversary (.8); review and analyze same (.3).
B190	04/21/25	E. Keil	1.40	Revise motion to dismiss and memorandum re same (1.1); correspondence with N. Rainey, D. Simon re filing of same (.3).
B190	04/21/25	N. Rainey	0.40	Electronically file motion to dismiss Julien adversary proceeding and supporting brief (.4).
B240	04/09/25	G. Karch	1.00	Conference with D. Simon (.2); prepare for upcoming conference with investors (.8).
B240	04/10/25	G. Karch	0.50	Review capital account information in preparation for conference with investors (.5).
B240	04/12/25	G. Karch	0.50	Review tax information in preparation for investor conference (.5).
B240	04/14/25	G. Karch	1.20	Review tax information in preparation for investor conference (.4); pre-conference with B. Baron, G. Johnston and D. Sklar (.8).
B240	04/15/25	G. Karch	1.00	Conference with I. Neuberger and other investors (.6); prepare summary re same and conference with



LaVie Care Centers, LLC

Client: 120098  
Invoice: 4023839  
Invoice Date: 05/31/25

Task	Date	Name	Hours	Description
				D. Simon (.4).
B280	04/10/25	E. Keil	0.90	Correspondence with J. Watson, et al. re medical records (.3); review OTAs re same (.6).
B280	04/16/25	E. Keil	0.40	Correspondence with vendors re medical records (.4).
B280	04/17/25	E. Keil	0.30	Correspondence with Access re medical records (.3).
B310	04/17/25	E. Keil	0.50	Draft omnibus claims objection shell (.5).
B310	04/18/25	J. Lee	0.70	Correspondences with E. Keil re omnibus claims objections (.4); review local rules and bankruptcy code re same (.3).
B310	04/18/25	E. Keil	4.20	Revise claim objection pleading (1.2); correspondence with J. Lee, D. Simon re same (.4); conference with R. Ahmed re claims reconciliation (.6); draft 503(b)(9) claim objections (1.9); correspondence with J. Muenker, D. Simon re same (.1).
B310	04/18/25	D. Simon	0.80	Conferences with J. Muenker and E. Keil re claim reconciliation matters (.8).
B310	04/19/25	J. Lee	2.40	Draft omnibus claims objection re late filed claims (1.7); review bar date order re same (.2); review Schedules and SOFAs re same (.2); correspondences with E. Keil re same (.2); conference with R. Ahmed re same (.1).
B310	04/19/25	E. Keil	3.60	Draft 503(b)(9) claim objections (3.6).
B310	04/20/25	J. Lee	4.20	Draft omnibus claims objection re satisfied and amended claims (1.7); draft exhibit re omnibus objection to late filed claims (1); review proof of claims re same (1.1); correspondences with R. Ahmed re same (.4).
B310	04/21/25	J. Lee	1.70	Correspondence with R. Ahmed re proofs of claim (.2); draft omnibus objection re misclassified claims (1); conference with C. Catanese re claim categorization and analysis (.3); correspondence with E. Keil re initial drafts (.2).
B310	04/21/25	D. Simon	0.80	Conference with E. Keil re claims (.4); conference with J. Muenker re same (.4).
B310	04/21/25	E. Keil	1.10	Conference with J. Muenker, D. Simon re claims analysis (.6); analysis re same (.5).
B310	04/22/25	J. Lee	0.90	Correspondence with E. Keil re omni objections and wages claims (.2); correspondence with R. Ahmed



LaVie Care Centers, LLC

Client: 120098  
Invoice: 4023839  
Invoice Date: 05/31/25

Task	Date	Name	Hours	Description
B310	04/22/25	D. Simon	1.20	re same (.1); review additional proofs of claims (.6). Participate in conference re claims reconciliation, and analysis re same (1.2).
B310	04/22/25	E. Keil	5.20	Claim reconciliation (1.9); conference with D. Simon re same (.8); revise same (.9); draft 503(b)(9) claims objections (1.6).
B310	04/23/25	D. Simon	1.50	Multiple conferences and correspondence with E. Keil and J. Muenker re claims objection strategies and issues (1.5).
B310	04/23/25	E. Keil	9.10	Continue claims reconciliation of secured, priority, and administrative claims (5.7); revise summary spreadsheet re same (1.8); conference with Synergy re tax claims (.5); draft summary re same for V. Jones (.8); correspondence with V. Jones re same (.3).
B310	04/24/25	J. Lee	7.50	Conference with E. Keil re omnibus objections (.4); correspondence with E. Keil re same (.2); revise omnibus objections re late filed, amended and satisfied (3); correspondence with E. Keil re same (.2); draft omnibus objections re misclassified and no liability (2); draft exhibits re same (.9); research types of claim classification (.4); review bankruptcy rules re same (.2); correspondence with E. Keil re same (.2).
B310	04/24/25	E. Keil	5.50	Conferences with D. Simon, J. Lee re claims reconciliation (.6); conference with R. Ahmed re same (.8); revise reconciliation re same (1.9); revise omnibus claims objections re same (1.8); correspondence with V. Jones re priority tax claims (.4).
B310	04/25/25	J. Lee	0.50	Research re reclassification of claims (.3); correspondence with E. Keil re same (.2).
B310	04/25/25	E. Keil	6.90	Revise omnibus claim objections and 503(b)(9) objections (6.9).
B310	04/26/25	E. Keil	3.10	Revise claim objections and update claim reconciliation (3.1).
B310	04/27/25	E. Keil	9.60	Revise 503(b)(9), priority, secured claim objections and update reconciliation re same (9.6).
B310	04/28/25	D. Simon	0.80	Multiple conferences with Synergy and E. Keil re claims reconciliation (.8).



LaVie Care Centers, LLC

Client: 120098  
Invoice: 4023839  
Invoice Date: 05/31/25

Task	Date	Name	Hours	Description
B310	04/28/25	E. Keil	17.30	Revise claim objections and update reconciliation re same (5.8); conference with D. Simon re same (.5); conference with Synergy, J. Muenker re same (.9); revise summary re same (.3); revise 503(b)(9) claim objections and update reconciliation summary re same (9.8).
B310	04/29/25	D. Simon	2.00	Multiple conferences and correspondence with E. Keil re claims objections (.8); review re same (1.2).
B310	04/29/25	E. Keil	9.40	Revise 503(b)(9) objections and revise reconciliation re same (2.9); revise omnibus objections and coordinate filing of same (5.6); conference with clerk re filing ECF codes re same (.5); conferences with D. Simon re same (.4).
B310	04/29/25	N. Rainey	6.30	Electronically file objection to proof of claim filed by M. Imarhiagbe (.2); correspondence with E. Keil re same (.1); electronically file first, second, third and fourth omnibus claims objections (1.3); multiple correspondence with E. Keil re same (.3); electronically file x14 objections to 503(b)(9) claims filed by Tampa Bay Hospitalists, Summit Companies, Town of Woodstock, Mulvaney Property Maintenance, Engineered Electronics, C. Willis, Grain Coast, C. Pagana, A. Clanton, CSI Mechanical, Bucktom Services, D. Stgelais, Champion Comfort Experts and Palmer B Haas Inc. (4.1); multiple correspondence with E. Keil re same (.3).
B310	04/30/25	D. Simon	0.50	Multiple correspondence with E. Keil re claims objections (.5).
B310	04/30/25	E. Keil	5.40	Revise and finalize multiple claim objections, and update reconciliation re same (5.4).
B310	04/30/25	N. Rainey	4.30	Electronically file fifth, sixth, seventh and eighth omnibus claims objections (1.2); multiple correspondence with E. Keil re same (.2); electronically file x8 objections to 503(b)(9) claims filed by Curran Taylor, Sherwin Williams, MediLogix, A. Ice, V. Grant, M. Chapman, E. Smith and Sunbelt Rentals (2.6); multiple correspondence with E. Keil re same (.3).
B320	04/02/25	E. Keil	3.10	Draft closing checklist and review plan/confirmation





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LaVie Care Centers, LLC

Client: 120098  
Invoice: 4023839  
Invoice Date: 05/31/25

Task	Date	Name	Hours	Description
				order re same (3.1).
B320	04/03/25	E. Keil	1.00	Conference with R. Ahmed re closing statement (.7); revise same (.3).
B320	04/08/25	E. Keil	0.70	Conference with R. Ahmed re closing statement (.7).
B320	04/11/25	E. Keil	0.80	Conference with D. Simon, R. Ahmed re closing statement and checklist (.6); correspondence with R. Ahmed re same (.2).
B320	04/15/25	E. Keil	1.40	Conference with J. Muenker, D. Simon, R. Ahmed re effective date prep (.9); review claims schedule re same (.5).
B320	04/22/25	E. Keil	0.60	Correspondence and conference with R. Ahmed re effective date (.6).
B320	04/24/25	E. Keil	0.50	Revise effective date checklist (.3); conference with D. Marker re effective date preparation (.2).
B320	04/25/25	E. Keil	0.30	Correspondence with Ankura, Synergy re effective date preparation (.3).
B470	04/03/25	A. Chatham	0.20	Review correspondence from plaintiff's counsel to court re requested dismissal of Brandon litigation (.2).
B470	04/14/25	A. Chatham	0.20	Review order dismissing case without prejudice (.1); correspondence with D. Simon re same (.1).
B470	04/17/25	T. Cramton	0.50	Conference with E. Keil re response/motion to dismiss pro se adversary proceeding (.5).
B470	04/18/25	T. Cramton	0.40	Conference with E. Keil on MTD re pro se adversary complaint, plus pull and send related legal research re same (.4).
B470	04/23/25	T. Cramton	0.40	Correspondence with D. Simon re proposed discharge injunction notice, including follow-up with J. Winters for research/precedent re same (.4).
B470	04/24/25	J. Winters	1.10	Analyze notices of discharge injunction (1.1).
B470	04/25/25	T. Cramton	0.50	Review J. Winters research and findings on discharge injunction notice, including follow-up re same (.4); update D. Simon and E. Keil re same (.1).
B470	04/28/25	T. Cramton	0.20	Follow up with D. Simon and E. Keil re discharge injunction notice, including circulating revised and updated findings and analysis from J. Winters legal research (.2).
B470	04/28/25	J. Winters	0.10	Correspondence with T. Cramton re notices of default injunction (.1).





LaVie Care Centers, LLC

Client: 120098  
Invoice: 4023839  
Invoice Date: 05/31/25

Task	Date	Name	Hours	Description
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**Total Hours 224.90**

### Timekeeper Summary

Name	Hours	Rate	Amount
A. Chatham	0.40	1,525.00	610.00
T. Cramton	2.00	1,290.00	2,580.00
J. Haake	4.40	1,335.00	5,874.00
G. Karch	4.20	2,210.00	9,282.00
E. Keil	147.40	1,245.00	183,513.00
C. Lee	1.70	1,155.00	1,963.50
J. Lee	17.90	1,020.00	18,258.00
D. Northrop	0.30	745.00	223.50
N. Rainey	17.50	500.00	8,750.00
D. Simon	27.90	1,650.00	46,035.00
J. Winters	1.20	925.00	1,110.00
<b>Totals</b>	<b>224.90</b>		<b>\$278,199.00</b>

### Task Code Summary

Task Code	Description	Hours	Amount
B110	Case Administration	3.30	3,487.00
B120	Asset Analysis and Recovery	2.10	1,795.00
B130	Asset Disposition	53.00	70,904.50
B140	Relief from Stay/Adequate Protection Proceedings	0.70	934.50
B150	Mtgs/Communications w/Creditor	0.30	373.50
B155	Court Hearings	6.40	8,492.50
B160	Fee/Employment Applications	0.90	599.00
B185	Assumption/Rejection of Leases	1.90	1,769.50
B190	Other Contested Matters	21.50	26,993.00
B240	Tax Issues	4.20	9,282.00
B280	Vendor Matters	1.60	1,992.00
B310	Claims Administration & Object	117.00	136,818.50
B320	Plan and Disclosure Statement	8.40	10,458.00
B470	Litigation	3.60	4,300.00
		<b>224.90</b>	<b>278,199.00</b>

1180 Peachtree Street, NE Suite 3350 Atlanta, GA 30309 Tel +1 404 260 8535

US practice conducted through McDermott Will & Emery LLP.



LaVie Care Centers, LLC

Client: 120098  
Invoice: 4023839  
Invoice Date: 05/31/25

## Costs and Other Charges

Description	Amount
Computer Research	6,959.19
Computer Research	
Document Services	99.45
VENDOR: eScribers LLC; INVOICE#: 1143957; DATE: 4/29/202 - Obtain transcript of April 24, 2025 hearing on motion for transfer of operations and assets (Harts Harbor) in In re LaVie Care Centers, LLC, et al., Case No. 24-55507 (PMB) (U.S. Bankruptcy Court for the Northern District of Georgia)	
Filing/Registration Fee	199.00
VENDOR: BMO Harris Bank NA; INVOICE#: 6881042625NR; DATE: 4/26/2025 - Filing fee re Harts Harbor Sale Motion	
<b>Total Costs and Other Charges</b>	<b>\$7,257.64</b>

**EXHIBIT A-12**

**Time and Expense Detail**  
***May 1, 2025 – June 1, 2025***



Invoice: 4029593  
Client: 120098

06/16/25

LaVie Care Centers, LLC  
1040 Crown Pointe Parkway  
Atlanta, GA 30338

For Services Rendered in Connection with:

Matter: 0013 Chapter 11

Task	Date	Name	Hours	Description
B130	05/01/25	E. Keil	1.20	Correspondence and conferences with New Operator re Harts Harbor closing (.5); revise closing documents re same (.3); conferences with J. Watson re same (.4).
B130	05/02/25	E. Keil	1.00	Correspondence with D. Simon, J. Watson re effective date workstreams (.4); attention to issues re same (.6).
B130	05/06/25	E. Keil	0.60	Conference with D. Simon re effective date workstreams (.6).
B130	05/07/25	D. Simon	0.70	Multiple conferences with Synergy and J. Muenker re potential closing issues (.7).
B130	05/07/25	E. Keil	0.40	Correspondence with New Operator re tax payment (.2); correspondence with Synergy re closing documents (.2).
B130	05/09/25	D. Simon	0.50	Conference with D. Dias re effective date matters, and internal communications re same (.5).
B130	05/15/25	D. Simon	0.70	Conferences with Ankura and Synergy re closing matters (.7).
B130	05/16/25	D. Simon	0.40	Conferences with D. Dias re closing matters (.4).
B130	05/17/25	D. Simon	0.50	Conference with E. Keil re closing and outstanding matters (.5).
B130	05/19/25	D. Simon	0.50	Conferences with Synergy re open closing matters (.5).
B130	05/20/25	D. Simon	0.80	Multiple conferences with Synergy, J. Muenker and others re closing matters (.8).
B130	05/21/25	D. Simon	0.80	Conferences with Synergy and MidCap re closing funding and mechanics (.8).
B130	05/21/25	E. Keil	1.20	Conference with MidCap re effective date preparations (.4); correspondence with KCC team re amended schedules (.3); analyze materials re same (.5).



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LaVie Care Centers, LLC

Client: 120098  
Invoice: 4029593  
Invoice Date: 06/16/25

Task	Date	Name	Hours	Description
B130	05/22/25	E. Keil	0.30	Correspondence with B. Jones, R. Ahmed re closing (.3).
B130	05/23/25	D. Simon	1.20	Multiple conferences re closing matters (1.2).
B130	05/23/25	E. Keil	0.40	Conference with UCC, MWE, Ankura, et al. re closing (.4).
B130	05/27/25	E. Keil	0.40	Conference with J. Watson, A. Matthews, et al. re closing workstreams (.4).
B130	05/27/25	D. Simon	1.50	Numerous conferences re closing matters and claims (1.5).
B130	05/28/25	E. Keil	1.70	Conference with UCC, Synergy, et al. re closing (.3); prepare closing documents, officers' certificate, et al. (1.4).
B130	05/28/25	D. Simon	1.80	Multiple conferences and communications re closing matters and reconciliation (1.8).
B130	05/29/25	E. Keil	1.50	Compile officers certificate (.8); conference with GUC Trustee, Troutman re effective date (.4); correspondence with Synergy re same (.3).
B130	05/29/25	D. Simon	1.80	Review and communications re closing matters and claims reconciliation (1.4); conference with D. Thomas re same (.4).
B130	05/30/25	E. Keil	1.90	Conference with Synergy, D. Simon, J. Muenker re closing (.5); conference with UCC, Omega, et al. re same (.5); correspondence re closing documents re same (.4); revise notice of effective date (.5).
B130	05/30/25	D. Simon	0.50	Prepare for and participate in closing conference (.5).
B130	06/01/25	E. Keil	0.30	Correspondence with J. Watson, D. Simon, et al. re closing signatures (.3).
B155	05/21/25	N. Rainey	0.30	Electronically file notice of 5.22.25 hearing cancellation (.2); correspondence with E. Keil re same (.1).
B155	05/21/25	E. Keil	0.20	Draft notice of cancelled hearing (.1); correspondence with chambers, N. Rainey re filing of same (.1).
B155	05/29/25	N. Rainey	0.30	Electronically file seventh notice of omnibus hearings (.2); correspondence with E. Keil re same (.1).
B160	05/12/25	N. Rainey	0.30	Electronically file Ankura's monthly staffing report for April 2025 (.2); correspondence with E. Keil re same (.1).



**McDermott  
Will & Emery**

LaVie Care Centers, LLC

Client: 120098  
Invoice: 4029593  
Invoice Date: 06/16/25

Task	Date	Name	Hours	Description
B190	05/06/25	E. Keil	0.80	Revise order re motion to dismiss adversary (.5); correspondence with D. Hensley re same (.2); correspondence with N. Rainey re uploading same (.1).
B190	05/06/25	N. Rainey	0.30	Upload x2 orders re dismissal of Julien adversary proceeding (.2); correspondence with E. Keil re same (.1).
B190	05/09/25	E. Keil	0.30	Revise stipulation re Vero Beach adversary (.2); correspondence with counsel to Vero Beach re same (.1).
B190	05/22/25	D. Simon	0.50	Conference with Committee and others re closing logistics (.5).
B210	05/20/25	E. Keil	0.80	Draft responses re schedule amendments (.6); revise same (.2).
B210	05/30/25	E. Keil	4.40	Review and revise schedule amendments (3.9); correspondence with KCC, N. Rainey re filing of same (.3); conference with G. Johnson re same (.2).
B210	05/30/25	N. Rainey	2.90	Electronically file x39 A/B schedule amendments (2.9).
B210	05/31/25	E. Keil	0.30	Correspondence with N. Rainey re schedule amendments (.3).
B210	05/31/25	N. Rainey	5.90	Electronically file x49 A/B schedule amendments (5.9).
B230	05/02/25	J. Jumbeck	1.40	Review and analyze Harts Harbor financing statement (.2); review and analyze precedent financing resolutions (.4); draft Debtor operator resolutions re exit facility (.8).
B230	05/04/25	E. Keil	0.30	Correspondence with J. Jumbeck re certificates, resolutions for MidCap exit facility (.3).
B310	05/01/25	E. Keil	0.30	Analysis re IRS priority tax claims (.3).
B310	05/02/25	E. Keil	1.40	Revise summary of priority and secured claims reconciliation (1.4).
B310	05/03/25	E. Keil	3.20	Draft omnibus claim objection procedures (3.2).
B310	05/05/25	E. Keil	1.50	Revise omnibus claims procedures (1.3); correspondence with UCC re same (.2).
B310	05/06/25	D. Simon	0.70	Conference with E. Keil re claims and open plan matters, and communications re same (.7).
B310	05/07/25	E. Keil	2.20	Revise motion for omnibus claim procedures (1.6); conferences and correspondence with D. Simon, N. Rainey re filing of same (.3); correspondence with



LaVie Care Centers, LLC

Client: 120098  
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Invoice Date: 06/16/25

Task	Date	Name	Hours	Description
B310	05/07/25	N. Rainey	0.50	V. Jones re IRS claims (.3). Electronically file motion for omnibus claim procedures (.2); correspondence with E. Keil and D. Northrop re same (.3).
B310	05/12/25	E. Keil	0.40	Review response to claim objections and analyze same (.4).
B310	05/18/25	E. Keil	1.90	Revise priority and secured claims reconciliation (1.9).
B310	05/19/25	E. Keil	1.20	Revise priority, administrative claims reconciliation (1.2).
B310	05/21/25	N. Rainey	0.30	Upload proposed order establishing claims objection procedures (.1); upload further revised proposed order establishing claims objection procedures (.1); correspondence with E. Keil re same (.1).
B310	05/21/25	E. Keil	3.50	Revise claims reconciliation (2.0); revise omnibus claim objections procedures order (.2); draft omnibus claims objections re priority, secured, 503(b)(9) claims (1.3).
B310	05/26/25	E. Keil	5.70	Draft omnibus claim objections for asserted priority claims, asserted secured claims, and asserted 503(b)(9) claims (5.7).
B310	05/27/25	E. Keil	8.80	Analysis re priority, secured, 503(b)(9) claims and revise summary re same (4.8); revise multiple omnibus claim objections re same (2.2); conference with D. Simon re same (.6); correspondence with IRS re outstanding priority claims (.5); correspondence with Ankura, MWE, Synergy re claims analysis (.4); conference with G. Johnson re schedule amendments (.3).
B310	05/28/25	E. Keil	8.80	Conferences with G. Hayes, J. Watson, R. Ahmed, et al. re claims analysis (.8); conferences with D. Simon re same (.2); conferences with R. Ahmed, J. Muenker, D. Simon re same (.8); revise omnibus claims objections (5.8); conferences with R. Ahmed re same (1.2).
B310	05/29/25	E. Keil	14.60	Revise omnibus claims objections and schedules re same (8.7); conferences with D. Simon, B. Jones, R. Ahmed, et al. re claim objections (.7); conference Synergy team re same (.5); revise claim register summary (4.3); conference with V. Jones re IRS





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LaVie Care Centers, LLC

Client: 120098  
Invoice: 4029593  
Invoice Date: 06/16/25

Task	Date	Name	Hours	Description
				claims (.4).
B310	05/29/25	N. Rainey	1.00	Finalize and electronically file ninth, tenth, eleventh and twelfth omnibus claim objections (.8); multiple communications with E. Keil re same (.2).
B310	05/30/25	E. Keil	3.20	Revise IRS claims objection (.6); revise claim register summaries (1.9); draft notice of revise exhibit A (.4); conference with N. Rainey re same (.3).
B310	05/30/25	N. Rainey	0.80	Finalize and electronically file thirteenth omnibus claims objection (.2); multiple communications with E. Keil re amendment to eleventh omnibus claims objection (.2); correspondence with court re same (.2); electronically file notice re same (.2).
B320	05/01/25	E. Keil	1.80	Draft motion re entry for final decree (1.4); conference with J. Watson, D. Simon re DOJ settlement (.4).
B320	05/08/25	E. Keil	1.00	Revise plan supplement re officer replacement (.3); conference with J. Muenker, D. Simon re same (.4); correspondence with Ankura team re effective date (.3).
B320	05/09/25	E. Keil	0.80	Revise plan supplement notice (.3); correspondence with J. Watson, A. Matthews re same (.2); correspondence with J. Muenker, D. Simon re same (.1); conference with D. Simon re same (.2).
B320	05/12/25	D. Simon	0.60	Communications with Committee and conference re effective date matters (.6).
B320	05/13/25	E. Keil	0.30	Revise plan supplement (.2); correspondence with J. Muenker, D. Simon re same (.1).
B320	05/14/25	N. Rainey	0.30	Electronically file amended plan supplement (.2); correspondence with E. Keil re same (.1).
B470	05/06/25	T. Cramton	0.50	Prepare and send draft discharge injunction notice to D. Simon, including related correspondence and internal conference (.5).
<b>Total Hours</b>			<b>106.90</b>	



LaVie Care Centers, LLC

Client: 120098  
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### Timekeeper Summary

Name	Hours	Rate	Amount
T. Cramton	0.50	1,290.00	645.00
J. Jumbeck	1.40	1,245.00	1,743.00
E. Keil	78.60	1,245.00	97,857.00
N. Rainey	12.90	500.00	6,450.00
D. Simon	13.50	1,650.00	22,275.00
<b>Totals</b>	<b>106.90</b>		<b>\$128,970.00</b>

### Task Code Summary

Task Code	Description	Hours	Amount
B130	Asset Disposition	22.60	32,875.50
B155	Court Hearings	0.80	549.00
B160	Fee/Employment Applications	0.30	150.00
B190	Other Contested Matters	1.90	2,344.50
B210	Business Operations	14.30	11,247.50
B230	Financing/Cash Collections	1.70	2,116.50
B310	Claims Administration & Object	60.00	73,046.50
B320	Plan and Disclosure Statement	4.80	5,995.50
B470	Litigation	0.50	645.00
		106.90	128,970.00

### Costs and Other Charges

Description	Amount
Computer Research	444.60
Computer Research	
<b>Total Costs and Other Charges</b>	<b>\$444.60</b>

**EXHIBIT B**

**Declaration of Daniel M. Simon**

**IN THE UNITED STATES BANKRUPTCY COURT  
NORTHERN DISTRICT OF GEORGIA  
ATLANTA DIVISION**

In re:	)	
	)	Chapter 11
	)	
LAVIE CARE CENTERS, LLC, <i>et al.</i> , <sup>1</sup>	)	Case No. 24-55507 (PMB)
	)	
Debtors.	)	(Jointly Administered)
	)	
	)	<b>Obj. Deadline: Aug. 6, 2025 at 4:00 p.m. (ET)</b>
	)	<b>Hr'g Date: Aug. 29, 2025 at 10:00 a.m. (ET)</b>
		<i>(Only if objections are filed)</i>

**DECLARATION OF DANIEL M. SIMON IN SUPPORT OF THE FINAL  
APPLICATION OF MCDERMOTT WILL & EMERY LLP, COUNSEL TO THE  
DEBTORS AND DEBTORS-IN-POSSESSION, FOR ALLOWANCE AND PAYMENT  
OF COMPENSATION AND REIMBURSEMENT OF EXPENSES**

I, Daniel M. Simon, declare under penalty of perjury that the statements contained in the foregoing Application as to fees and expenses sought for McDermott are true and correct and that no agreement exists, directly or indirectly, for division of compensation to be awarded with any creditor, the Debtors, or any other attorney or any other person whatsoever.

Dated: July 16, 2025  
Atlanta, Georgia

**MCDERMOTT WILL & EMERY LLP**

/s/ Daniel M. Simon

Daniel M. Simon (Georgia Bar No. 690075)  
1180 Peachtree St. NE, Suite 3350  
Atlanta, Georgia 30309  
Telephone: (404) 260-8535  
Facsimile: (404) 393-5260  
Email: dsimon@mwe.com

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<sup>1</sup> The last four digits of LaVie Care Centers, LLC's federal tax identification number are 5592. There are 282 Debtors in these chapter 11 cases, which are being jointly administered for procedural purposes only. A complete list of the Debtors and the last four digits of their federal tax identification numbers are not provided herein. A complete list of such information may be obtained on the website of the Debtors' claims and noticing agent at <https://www.veritaglobal.net/LaVie>. The location of LaVie Care Centers, LLC's corporate headquarters and the Debtors' service address is 1040 Crown Pointe Parkway, Suite 600, Atlanta, GA 30338.